

Exhibit 2



Planet Depos[®]
We Make It *Happen*[™]

Transcript of Angela Svonavec

Date: November 4, 2024

Case: Heritage Holding Co. -v- KTRV, LLC / Banshee Industries -v- Heritage Coal

Planet Depos

Phone: 888.433.3767 | **Email:** transcripts@planetdepos.com

www.planetdepos.com

Michigan #8598 | Nevada #089F | New Mexico #566

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

HERITAGE HOLDING CO.,)
LLC, a Pennsylvania)
limited liability)
company,)

PLAINTIFF,)

VS.)

KTRV, LLC,)

DEFENDANT.)

Civil Action No.
2:24-cv-1448

BANSHEE INDUSTRIES, LLC,)
Pennsylvania limited)
liability company,)

PLAINTIFF,)

VS.)

HERITAGE COAL & NATURAL)
RESOURCES, LLC,)

DEFENDANT.)

Civil Action No.
3:24-cv-233

ORAL AND VIDEOTAPED DEPOSITION OF
ANGELA SVONAVEC
NOVEMBER 4, 2024

ORAL AND VIDEOTAPED DEPOSITION OF ANGELA SVONAVEC,
produced as a witness at the instance of the DEFENDANT,
and duly sworn, was taken in the above-styled and
numbered cause on the NOVEMBER 4, 2024, from 9:22 a.m.
to 1:56 p.m., before Jodi Goodman, CSR, RPR, CRR, CRC,
reported by machine shorthand, at the offices of Regus,
3080 Tamiami Tr E, Suite 301, Naples, FL 34112, pursuant
to the Federal Rules of Civil Procedure and the
provisions stated on the record or attached hereto.

Transcript of Angela Svonavec
Conducted on November 4, 2024

2

A P P E A R A N C E S

FOR THE PLAINTIFFS:

Mr. Chadd Colin
MORELLA & ASSOCIATES
706 Rochester Road
Pittsburgh, PA 15237
412-369-9696

FOR THE DEFENDANTS:

Mr. Curtis Krasik
K&L GATES, LLP
K&L Gates Center
210 Sixth Avenue
Pittsburgh, PA 15222
412-355-6500

ALSO PRESENT:

Ms. Michelle Mejia, Videographer

Transcript of Angela Svonavec
Conducted on November 4, 2024

3

1	INDEX		
2			PAGE
3	Appearances.....		2
4	ANGELA SVONAVEC		
5	Examination by Mr. Krasik.....		5
6	Signature and Changes.....		186
7	Reporter's Certificate.....		188
8	EXHIBITS		
9	NO.	DESCRIPTION	PAGE
10	1	Declaration of Domicile	13
11	2	2024 Florida Statutes	14
12	3	Compilation of Tax Returns	18
13	4	TriState Capital Bank Tax Information	33
14	5	Voter Information Lookup	56
15	6	Warranty Deed	61
16	7	Article - The Greater Cumberland Committee	63
17	8	Article - The Greater Cumberland Committee	70
18	9	UCC1 Financing Statement	72
19	10	Article from the Trib Democrat	74
20	11	Letter to Judge Bissoon	78
21	12	Motion to Transfer Venue	82
22	13	Letter from Rockwood Alliance Church	85
23	14	Civil Complaint	88
24	15	Excerpts from IRS Examiner Report	101
25	16	ATC Flight Record	124
	17	Certificate of Amendment	144
	18	Operating Agm't of Angela's Interest, LLC	146
	19	Operating Agm't of Jason's Interest, LLC	146
	20	Membership Interest Assignment Agreement	157
	21	Plaintiff's Motion in Support of Remand	159
	22	Membership Interest Assignment Agreement	166
	23	Contribution Agreement	170
	24	Amended and Restated Operating Agreement	174
	25	of Banshee Industries, LLC	
	REQUESTED DOCUMENTS/INFORMATION		
	NO.	DESCRIPTION	
	1	Property Records for 796 Portside Property	
	2	Proof of Checking Account for Ms. Svonavec at FNB	
	3	Copy of Ms. Svonavec's Passport	
	4	Documentation of Flights	
	5	Proof Ms. Svonavec was in Florida for the Dates	
		Contradictory to the ATC document, Exhibit 16	

Transcript of Angela Svonavec
Conducted on November 4, 2024

4

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

P R O C E E D I N G S

NOVEMBER 4, 2024

(Deposition commenced at 9:22 a.m.)

THE VIDEOGRAPHER: Here begins Media Number One in the videotaped deposition of Angela Svonavec in the matter of Heritage Holding Co. v. KTRV, LLC/Banshee Industries v. Heritage Coal, In the United States District Court for the Western District of Pennsylvania. Case Number 2:24-CV-1448.

Today's date is November 4th, 2024, and the time on the video monitor is 9:22 a.m. The videographer today is Michelle Mejio representing Planet Depos and this video deposition is taking place at Regus, 3080 Tamiami Trail East, Suite 301, Naples, Florida 34112.

Would counsel please identify themselves and state whom they represent?

MR. COLIN: Chadd Colin from Morella & Associates representing the Plaintiff -- Plaintiffs in both cases. Thank you.

MR. KRASIK: Curt Krasik with K&L Gates representing both Defendants.

THE VIDEOGRAPHER: Thank you. The court reporter today is Jodi Goodman representing Planet Depos. The witness will now be sworn.

THE REPORTER: Thank you.

Transcript of Angela Svonavec
Conducted on November 4, 2024

5

1 (Witness sworn)

2 ANGELA SVONAVEC,

3 having been first duly sworn, testified as follows:

4 EXAMINATION

5 BY MR. KRASIK:

6 Q. Good morning, Ms. Svonavec.

7 A. Good morning.

8 Q. As I said, my name is Curt Krasik and I
9 represent the Defendants in these cases. You
10 understand, ma'am, the obligations of the oath you just
11 took?

12 A. I do.

13 Q. Is there anything that would prevent you from
14 telling your full, complete and best testimony today?

15 A. There is not.

16 Q. Great. Would you state your full name for the
17 record?

18 A. Angela Lynn Svonavec.

19 Q. And what was your name at birth?

20 A. Angela Lynn Youngen.

21 Q. Okay. And where were you born, ma'am?

22 A. Meyersdale, Pennsylvania.

23 Q. What county is Meyersdale?

24 A. Somerset.

25 Q. Somerset County? And do you have any siblings?

Transcript of Angela Svonavec
Conducted on November 4, 2024

6

1 A. One.

2 Q. And what is his or her name?

3 A. Jennifer.

4 Q. Jennifer. Is Casey Schrift --

5 A. No.

6 Q. -- a sibling?

7 A. No.

8 Q. Okay. And where did you grow up, ma'am?

9 MR. COLIN: Object to the form. You can
10 answer.

11 A. I grew up in western Pennsylvania.

12 Q. (BY MR. KRASIK) Okay. In Somerset County?

13 A. Mostly, yes.

14 Q. And where else?

15 A. Well, my family had businesses in Maryland,
16 too, so we spent -- we worked every day in Maryland.

17 Q. Where was your residence?

18 A. In Harvest Drive, Rockwood, PA. That's where
19 my parents live.

20 Q. Okay. And what high school did you go to,
21 ma'am?

22 A. Rockwood.

23 Q. And did you pursue any education after high
24 school?

25 A. Yes.

Transcript of Angela Svonavec
Conducted on November 4, 2024

7

1 Q. What was that?

2 A. A lot.

3 Q. Please.

4 A. Let me see if I can recall it all. It's --
5 it's very diverse, so I did -- first I did nursing.

6 Q. Uh-huh.

7 A. Got my RN. I then did my doctorate in
8 naturopathic medicine through Clayton College in
9 Alabama. I studied in Ashrams, I -- mostly the Bahamas.
10 I studied the Kripalu up in Massachusetts. I studied
11 the Australasion Herbal College. I studied mechanics.
12 I'm actually a mechanic also. I took courses in
13 trucking. I have my CDLs. That was before -- some
14 of -- this isn't all in order.

15 Q. Uh-huh.

16 A. That's all I can recall right now.

17 Q. Okay. And it sounds like some -- at least some
18 of those were outside of Pennsylvania?

19 A. Yes.

20 Q. Were any in Pennsylvania?

21 A. The nursing was in Pittsburgh.

22 Q. Okay. So for a time you lived outside of
23 Pennsylvania?

24 A. Yes.

25 Q. And then returned to Pennsylvania?

Transcript of Angela Svonavec
Conducted on November 4, 2024

8

1 A. Yes.

2 Q. Okay. And when did you return to reside in
3 Pennsylvania after school?

4 A. I don't really -- I don't really recall exactly
5 the year. I want to say maybe -- I hate to guess.

6 Q. I don't -- just tell me your best testimony.
7 So was it before 2000?

8 A. Around 2000.

9 Q. All right. Around 2000.

10 A. '99 -- well, '98, I'll bet.

11 Q. Okay. And where did you live at that time?

12 A. When I came back I lived for a little while
13 at -- in a property my grandmother lived in Rockwood --
14 or she didn't live there. She owned it and then moved
15 to the Mud Pike Road.

16 Q. And that's in Rockwood?

17 A. That was in Rockwood.

18 Q. Okay. Okay. And at some point you got married
19 to Jason Svonavec?

20 A. Uh-huh.

21 Q. And when was that?

22 A. We stayed 2000 -- 2002.

23 Q. And were you married before marrying Jason
24 Svonavec?

25 A. Yes.

Transcript of Angela Svonavec
Conducted on November 4, 2024

9

1 Q. Okay. And what was your ex-husband's name?

2 A. Travis.

3 Q. Travis. Okay. And where did you live during
4 the time of your prior marriage?

5 A. That's where we lived at my grandma's house for
6 a little while, the property she owned, and then Mud
7 Pike.

8 Q. Okay. And you had a child from that prior
9 marriage?

10 A. Sydney.

11 Q. Okay. And when was Sydney born?

12 A. '99.

13 Q. And where was Sydney born?

14 A. She was born in Conemaugh in Johnstown.

15 Q. And after -- let me ask first, did you get
16 divorced from Travis?

17 A. Uh-huh.

18 Q. Okay. Did you have a custody arrangement with
19 him regarding Sydney?

20 A. Yes.

21 Q. And under that custody arrangement, did you
22 have -- what was -- what amount of custody did you --

23 A. It was shared custody.

24 Q. Shared custody. Where did Travis live after
25 your divorce?

Transcript of Angela Svonavec
Conducted on November 4, 2024

10

1 A. I'm not sure.

2 Q. Well, in the times that you shared custody with
3 him where did you take Sydney?

4 A. Oh, he picked her up.

5 Q. He picked her up? You don't know where he
6 lived?

7 A. I -- no. I -- I think he moved a few times. I
8 can't recall.

9 Q. Okay. In Pennsylvania?

10 A. In Pennsylvania. Yes.

11 Q. Okay. And what was the shared custody
12 arrangement?

13 A. I had her most of the time. He got her on
14 Fridays and returned her Saturday mornings.

15 Q. And was that the relation -- was that the
16 arrangement schedule that you maintained through the
17 time she was 18?

18 A. Well, no, it got more relaxed.

19 Q. Okay. Okay. And you have a child in your
20 marriage with Jason Svonavec. Correct?

21 A. Uh-huh. Yep.

22 Q. And what is his name?

23 A. Spencer.

24 Q. Okay. And when was Spencer born?

25 A. In 2003.

Transcript of Angela Svonavec
Conducted on November 4, 2024

11

1 Q. And where was Spencer born?

2 A. He was born in Somerset Hospital. You know
3 what, I'm embarrassed as a mom. I have those reversed.
4 Sydney was born in Somerset Hospital and Spencer was
5 born in Johnstown, because Somerset, the OB closed.
6 Sorry. I have a menopausal brain right now.

7 Q. Thank you for correcting it. No -- no problem.

8 All right. And you and -- have you and
9 Jason been continuously married for, what is that, 23
10 years?

11 A. Yes.

12 Q. Okay. And where have you resided during your
13 marriage with Jason?

14 MR. COLIN: Object to form.

15 A. Yeah, so it's changed through the years.

16 Q. (BY MR. KRASIK) I assumed it had, so just tell
17 me everything.

18 A. Yes, so we lived in -- on Mud Pike for several
19 years. And then we'd owned a farm, so he wanted to
20 build on the farm and about the time -- let's see. I'd
21 moved here first. So around 2012 I moved to Florida,
22 but not in official capacity till 2014.

23 Q. Right.

24 A. And so I've been here ever since.

25 Q. And then you have a home at -- I'm trying to

Transcript of Angela Svonavec
Conducted on November 4, 2024

12

1 find the address. What other address -- or what other
2 house -- 192 Stone Ridge Lane. You have a house at 192
3 Stone Ridge Lane. Is that correct?

4 A. Yes, there's a property there.

5 Q. Okay. It's a property, but it's a house?

6 A. There's a house there, uh-huh.

7 Q. And you co-own the house?

8 A. Right, I'm on the deed.

9 Q. So you co-own it? Is there any difference in
10 your understanding being on the deed versus owning it?

11 A. I don't think so.

12 Q. Okay. Okay. And when was the 192 Stone Ridge
13 house built?

14 A. I'm not sure the year.

15 Q. It was a new -- was it a new construction?

16 A. It was.

17 Q. Okay. Where do you currently reside?

18 A. Currently here in Naples at 5792 Clarendon
19 Drive.

20 Q. And when did you start residing at 5792
21 Clarendon Drive? Withdraw the question.

22 When did you start residing in Florida?

23 A. In full capacity it was in 2014.

24 Q. And at that time what -- did you reside at 5792
25 Clarendon Drive?

Transcript of Angela Svonavec
Conducted on November 4, 2024

13

1 A. No, that time it was The Moorings. It was 796
2 Portside Drive.

3 Q. And at some time afterwards you moved to 5792
4 Clarendon Drive?

5 A. Yeah. Around 2020.

6 Q. Okay.

7 A. Maybe 2021.

8 Q. Okay.

9 A. That vicinity.

10 Q. Okay. I'll mark an exhibit and show it to you.

11 MR. KRASIK: For the witness and for you,
12 Chadd.

13 MR. COLIN: Thank you.

14 (Deposition Exhibit No. 1 marked)

15 Q. (BY MR. KRASIK) Ms. Svonavec, I've shown you
16 what I've marked as Exhibit 1. Do you recognize this
17 document?

18 A. Yes.

19 Q. Okay. And is this the declaration of domicile
20 that you filed in 2014?

21 A. Yes.

22 Q. Okay. And the date on this is May 22nd, 2014.
23 Correct?

24 A. Yes.

25 Q. Okay. And you filed this declaration -- if you

Transcript of Angela Svonavec
Conducted on November 4, 2024

14

1 look at the first paragraph -- where is it? In
2 conformity with Florida Statute Section 222.17. Do you
3 see that in the first paragraph?

4 A. I don't yet. The first paragraph to clerk.

5 Q. Above the address.

6 A. Declaration of Florida I'm filing in -- okay.
7 Yeah. Accord -- accordance and conformity, yes.

8 Q. Okay. And do you recall if you read Florida
9 Statute 222.17 at the time that you filed this?

10 A. I would not have, but my attorneys would have.

11 Q. I'm showing you what I've marked as Exhibit 2.

12 (Deposition Exhibit No. 2 marked)

13 Q. (BY MR. KRASIK) And this, Ms. Svonavec, you
14 can see is Section 222.17 of the Florida Statutes
15 manifesting and evidencing domicile in Florida. Do you
16 see that?

17 A. Yes.

18 Q. Okay. And if you'll turn your attention to
19 subparagraph 1, do you see that -- the filing that you
20 make showing he or she resides in is a sworn statement?

21 A. Yes.

22 Q. Okay. And if you look in paragraph 3, the
23 statute says that this sworn statement shall contain,
24 among other things, a declaration that the person making
25 the same, the declaration, is at the time of making such

Transcript of Angela Svonavec
Conducted on November 4, 2024

15

1 statement a bona fide resident of the State?

2 A. Uh-huh.

3 Q. Do you see that?

4 A. Yes.

5 Q. Okay. And at the time that you -- oh, last
6 thing. In paragraph 5 of the statute do you see that
7 the sworn statement permitted by this section shall be
8 signed under oath before an official authorized to take
9 affidavits. Do you see that?

10 A. Yes.

11 Q. Okay. And so you understand this is subject to
12 perjury?

13 A. Yes.

14 Q. Okay. And at the time that you made your
15 declaration of domicile, you understood that you were
16 making that declaration subject to penalties of perjury.
17 Is that right?

18 A. Correct.

19 Q. Okay. You can put that aside for now.

20 MR. KRASIK: Thank you.

21 Q. (BY MR. KRASIK) Okay. Turning back to the
22 declaration of domicile, Exhibit 1, if you look in the
23 middle of the declaration you swore under oath that you
24 formerly resided at 184 West Mud Pike, Rockwood,
25 Milford, PA 1557. Correct?

Transcript of Angela Svonavec
Conducted on November 4, 2024

16

1 A. 5557. Yes.

2 Q. Okay. And at that time for how long had you
3 lived at 184 West Mud Pike?

4 A. I can't remember what year that house was
5 built, but that's where -- when I came back after my
6 schooling that's where I lived.

7 Q. Okay. So since around 2000, we said?

8 A. No. That -- it would have been prior to that.

9 Q. Okay.

10 A. Because '98 --

11 Q. Okay.

12 A. -- was when I got married to Travis so it would
13 have been maybe '98.

14 Q. Okay.

15 A. '97. I can't -- I don't know exactly, but --

16 Q. Okay.

17 A. -- that's a long time ago.

18 Q. Okay. So at the time you filed this
19 declaration in 2014 you had lived there more than 15
20 years? Is that fair to say?

21 MR. COLIN: Object to form.

22 Q. (BY MR. KRASIK) I'm not trying to trick you.

23 A. I'm just having to do math. I'm not that good
24 at math.

25 Q. Okay.

Transcript of Angela Svonavec
Conducted on November 4, 2024

17

1 A. Yeah. So 2014, that would be 14 --

2 Q. Okay.

3 A. Yeah.

4 Q. When did you stop residing at 184 West Mud
5 Pike?

6 A. When I moved here, I --

7 Q. Okay. And did Jason Svonavec continue to live
8 at 184 West Mud Pike?

9 A. I -- yes. He'd have lived there till the house
10 at Stone Ridge was built.

11 Q. Okay. And we didn't remember exactly when that
12 was?

13 A. I don't --

14 Q. But 2018, 2019. About right? Stone Ridge?

15 A. I -- I don't know.

16 Q. Okay.

17 A. I'd say a little bit before that.

18 Q. Okay. But Jason continued to live at 184 West
19 Mud Pike at the time that you filed this declaration of
20 domicile in Florida?

21 A. Uh-huh. Yes.

22 Q. Okay. Prior to filing this declaration of
23 domicile, you had filed tax returns saying that you
24 lived in Pennsylvania. Right?

25 A. I don't do my taxes, so I don't know.

Transcript of Angela Svonavec
Conducted on November 4, 2024

18

1 Q. Okay. Let me show you what I've marked as
2 Exhibit 3, which is a collective exhibit of tax returns.

3 (Deposition Exhibit No. 3 marked)

4 Q. (BY MR. KRASIK) And, Ms. Svonavec, if you
5 would look at the first page of the exhibit, this is the
6 2012 U.S. individual income tax return. Do you see
7 that?

8 A. Yes.

9 Q. Okay. And the top line says Jason R. Svonavec
10 and the second line says Angela L. Svonavec. Do you see
11 that?

12 A. Yes.

13 Q. Okay. So would you agree that in 2012 you
14 filed a federal tax return saying that you lived with
15 Jason at 184 West Mud Pike?

16 A. Yes.

17 Q. Okay. And if you look on the second page, this
18 is the Pennsylvania income tax return for 2012, and
19 again, it's filed by Jason and Angela Svonavec. And if
20 you look on the right, there's the statuses. And I
21 think R on the third line down means PA resident. Do
22 you see that, ma'am?

23 MR. COLIN: Object to form.

24 A. I -- that's PA resident, nonresident, part year
25 resident.

Transcript of Angela Svonavec
Conducted on November 4, 2024

19

1 Q. (BY MR. KRASIK) Right.

2 A. Okay.

3 Q. And if -- if you see the bolded capital letters
4 it looks like for a PA resident you do -- you put R, for
5 a nonresident you put N, and for a part year resident
6 you put P.

7 A. Oh, okay.

8 Q. Do you see that?

9 A. Yes.

10 Q. Okay. And there's an R next to that residency
11 status for 2012. Correct?

12 A. I -- I don't see where that is.

13 Q. Well --

14 A. I see the Jason R. and Angela L.

15 Q. Uh-huh.

16 A. And where would -- where's the R that you're
17 referring to?

18 Q. So if you look at the right column of the
19 return, there's a line that says extension with an N
20 next to it. There's a line that says amended return
21 with an N next to it, and there's a residency status
22 with an R next to it. Do you see that?

23 A. Yes.

24 Q. Okay. And do you have any reason to believe
25 that R does not mean PA resident?

Transcript of Angela Svonavec
Conducted on November 4, 2024

20

1 MR. COLIN: Object to form.

2 A. Yeah, it says resident, nonresident or part
3 year resident.

4 Q. (BY MR. KRASIK) Right. But instead --

5 A. So --

6 Q. I'm sorry. Finish your answer.

7 A. So I don't think it's clear what it means. It
8 looks to me that it has a lot of meaning, but go ahead.

9 Q. We can agree it says R. Correct?

10 A. Yeah. The letter R. Yeah.

11 Q. All right.

12 A. The long definition.

13 Q. All right. And you understood when you were
14 filing your tax returns that you were filing them under
15 oath subject to penalties of perjury as well. Right?

16 MR. COLIN: Object to form.

17 A. I assume. They're prepared by professionals
18 and we just Docusign and send the checks.

19 Q. (BY MR. KRASIK) Okay. Well, you didn't -- you
20 didn't intend or know that any information in your
21 return was not accurate. Would that be fair to say?

22 MR. COLIN: Object to form.

23 A. Correct. I assumed they did everything
24 correctly.

25 Q. (BY MR. KRASIK) Okay. And if we look at page

Transcript of Angela Svonavec
Conducted on November 4, 2024

21

1 1 of the exhibit for the federal tax return, would this
2 mean that you were filing then married, filed jointly?

3 A. I --

4 MR. COLIN: Object to form.

5 A. -- don't know.

6 MR. COLIN: Object to form.

7 Q. (BY MR. KRASIK) Okay. If we look at page 2 of
8 your Pennsylvania tax return, I would direct your
9 attention to the right-hand column, the line under
10 residency status which we were looking at before, there
11 is a J?

12 A. Uh-huh.

13 Q. Do you see that?

14 A. Yes.

15 Q. Okay. And if you look at the options there's a
16 bolded capitalized M for filing jointly married?

17 A. Okay.

18 Q. And then a filing separately?

19 A. Uh-huh.

20 Q. And then final return and deceased. Do you see
21 those options?

22 A. I do, yes.

23 Q. Okay. And there's a J next to that line.

24 Correct?

25 A. Yes.

Transcript of Angela Svonavec
Conducted on November 4, 2024

22

1 Q. All right. So does that refresh your
2 recollection that you were filing --

3 MR. COLIN: Object to --

4 Q. (BY MR. KRASIK) -- jointly married in 2012?

5 MR. COLIN: Object --

6 A. I just don't --

7 MR. COLIN: Object to form.

8 Q. (BY MR. KRASIK) Go ahead.

9 A. I don't -- I don't recall how they were
10 prepared and what years they were joint and which years
11 they weren't, so we'll just have to look at the
12 record --

13 Q. (BY MR. KRASIK) Right.

14 A. -- and agree that however they prepared it
15 sounds --

16 Q. And my question was, does seeing this document
17 refresh your recollection as to how they were --

18 A. No, it doesn't.

19 Q. Okay. Let's look at -- if you could turn the
20 page to the third page of that document, which is the
21 federal income tax for 2013.

22 A. Uh-huh.

23 Q. And again, it says -- lists Jason R. Svonavec,
24 Angela L. Svonavec at 184 West Mud Pike. Correct?

25 A. Correct.

Transcript of Angela Svonavec
Conducted on November 4, 2024

23

1 Q. All right. Did you understand that you were
2 filing your 2013 U.S. tax returns jointly?

3 MR. COLIN: Object to form.

4 A. It wasn't something that was discussed with me.
5 I don't know how they were filed.

6 Q. (BY MR. KRASIK) Does seeing your 2013 federal
7 income tax return, at least what we have, refresh your
8 recollection they were filed jointly with your husband?

9 MR. COLIN: Object to form.

10 Q. (BY MR. KRASIK) Is that no?

11 A. No.

12 Q. If you could turn to the next page, which is
13 your 2013 Pennsylvania income tax return, it again lists
14 Jason R. and Angela L. Svonavec. Does this mean that
15 you were filing your Pennsylvania income tax returns
16 married, filing jointly --

17 MR. COLIN: Object --

18 Q. (BY MR. KRASIK) -- in 2013?

19 MR. COLIN: Object to form.

20 A. These are really questions for the accountant
21 that handled it. I don't know how -- I don't know how
22 they do. I'm being 100% honest with you. I don't
23 understand how taxes are prepared.

24 Q. Okay.

25 A. I put it in the hands of the professionals.

Transcript of Angela Svonavec
Conducted on November 4, 2024

24

1 Q. Okay. In 2013 and 2012 did you reside in
2 Pennsylvania?

3 A. I believe so.

4 Q. Okay. And so did you file your federal -- your
5 Pennsylvania income tax returns together with your
6 husband as a PA resident?

7 MR. COLIN: Object to form.

8 A. That's a tax question for the accountant.

9 Q. (BY MR. KRASIK) Okay. And before we leave
10 this 2013 Pennsylvania return, I would direct your
11 attention to the second line where it says residency
12 status. Do you see that?

13 A. Yes.

14 Q. And you see the R next to that?

15 A. Yes.

16 Q. And under that residency status line, you see
17 there's a bolded R -- capitalized R for PA resident and
18 a capitalized, bolded N for nonresident and a bolded,
19 capitalized P for part year resident? Do you see that,
20 ma'am?

21 A. Yes.

22 Q. Okay. And you've listed R. Correct?

23 MR. COLIN: Object to form.

24 A. I don't see where it's listed as an R.

25 Q. (BY MR. KRASIK) Next to residency status does

Transcript of Angela Svonavec
Conducted on November 4, 2024

25

1 it say R, N or P?

2 A. Oh, R.

3 Q. Yes. And the line below that, do you see a J?

4 A. Yes.

5 Q. Okay. And the -- next to the J, are the
6 options single, married, filing jointly married, with a
7 bolded, capitalized M and a filing separately with a
8 bolded, capitalized S. Do you see that?

9 A. Yes.

10 Q. Okay. And there's a J next to that line on
11 your return. Correct?

12 A. Correct.

13 Q. Okay. All right. We can put aside Exhibit 3
14 for the moment.

15 So, Ms. Svonavec, what changed in May
16 of 2014 to make you a Florida resident?

17 MR. COLIN: Object to form.

18 A. I don't understand what -- what the question
19 means.

20 Q. (BY MR. KRASIK) Well, you already owned the
21 property in Florida. Correct?

22 A. Yeah, I don't know the exact date that it was
23 bought, but, yes.

24 Q. It was bought before 2014?

25 A. (Moving head up and down).

Transcript of Angela Svonavec
Conducted on November 4, 2024

26

1 Q. Correct?

2 A. I think it was bought in 2014.

3 Q. I believe earlier you said it was bought in
4 2012.

5 A. 2012 I lived on the other coast. The -- over
6 in like Bal Harbour and Sunny Isles. I think I came to
7 Naples in 2014 and that's where I established residency
8 and domicile.

9 Q. So the 796 Portside --

10 A. Is here in Naples.

11 Q. Okay. When did you move into that house?

12 A. I believe 2014.

13 Q. Okay. Prior to that you had a house on the
14 other coast?

15 A. Not a house, just property.

16 Q. You had another property?

17 A. I had like a yacht and a dock, that type of
18 property.

19 Q. Okay. Did you have a place to sleep?

20 A. That's where we slept, on the yacht.

21 Q. Okay. And that's property? Was there real
22 property? Did you have a deed to it?

23 A. I don't recall. I don't believe so. Probably
24 rented the space, but we owned the yacht, obviously.

25 Q. Okay. And your testimony now is that you

Transcript of Angela Svonavec
Conducted on November 4, 2024

27

1 bought the 796 Portside property in 2014?

2 A. I believe around that --

3 MR. COLIN: Object to form. Go ahead.

4 A. I believe around then. I --

5 MR. KRASIK: Okay. We're going to need the
6 property records for that, Chadd.

7 MR. COLIN: For the --

8 MR. KRASIK: That's not consistent with
9 what we know, so when 796 Portside -- when they started.

10 A. When the closing was? I didn't build it. It
11 was -- yeah, purchased.

12 MR. KRASIK: Since when she owned it.

13 Q. (BY MR. KRASIK) Okay. And do you have a
14 Florida driver's license, Ms. Svonavec?

15 A. I do.

16 Q. Okay. When did you get that?

17 A. I also believe 2014.

18 Q. So you had had property here previously, but
19 you did not have a Florida driver's license?

20 A. I don't understand the question.

21 Q. So you had property in Florida before 2014, but
22 you didn't have a Florida driver's license then?

23 A. I had a yacht down here.

24 Q. But you --

25 A. But I didn't live here. I lived here from 2014

Transcript of Angela Svonavec
Conducted on November 4, 2024

28

1 on. I got a driver's license here when I moved to this
2 state.

3 Q. Well, did -- when you had your boat on the
4 other coast, how often did you go there?

5 A. Not very often.

6 Q. No?

7 A. I didn't -- I didn't reside here then. I
8 didn't vote here. I didn't work from here. I just had
9 property over there.

10 Q. And it's your sworn testimony that you bought
11 the 796 Portside house in 2014?

12 A. That's my best --

13 MR. COLIN: Object to form. Object to
14 form. Go ahead.

15 A. I know and I keep saying it over and over.
16 It's my best guesstimate. I'd have to look up the exact
17 deed.

18 Q. (BY MR. KRASIK) Okay. Well, we'll get the
19 records and we'll check --

20 A. When I moved here is when I decided to move
21 here and I did everything here from registering to vote
22 to getting my driver's license to voting in every
23 election. I voted for Rick Scott back then, so that
24 would be -- if you count back the elections, DeSantis
25 has been twice, and -- so -- or Rick Scott and Ron

Transcript of Angela Svonavec
Conducted on November 4, 2024

29

1 DeSantis was twice, so eight -- 12 -- but then it's only
2 been two years of his, so at least -- at least for the
3 last ten years I've voted here. I think it's 2014.

4 Q. Okay. Your best memory is that you got your --
5 you registered to vote in Florida in 2014?

6 A. Correct.

7 Q. Okay. Not before that?

8 A. I don't believe so.

9 Q. Okay.

10 A. I think the year --

11 THE WITNESS: Does he have the checklist?
12 Do you know?

13 MR. COLIN: I don't -- I don't know what
14 you're referring to specifically, but why don't you wait
15 for Mr. Krasik to ask you a question and then respond to
16 the question that he asks you.

17 THE WITNESS: Okay.

18 MR. KRASIK: We'll get the property records
19 for 796 Portside and we'll clarify that.

20 A. Okay. I think it's really well documented, I
21 know.

22 Q. (BY MR. KRASIK) Okay. And, Ms. Svonavec, at
23 the time that you submitted this declaration of domicile
24 you still owned property in Pennsylvania. Correct?

25 A. Yes.

Transcript of Angela Svonavec
Conducted on November 4, 2024

30

1 Q. Okay. At the time you owned or co-owned 184
2 West Mud Pike. Correct?

3 A. At -- at the time I purchased Portside Drive?
4 I -- I believe so. Yes.

5 Q. Okay. And then after you -- well, how -- what
6 happened to the 184 West Mud Pike property in
7 Pennsylvania? Did you sell it? Did you just continue
8 to own it?

9 A. Eventually it was sold.

10 Q. You sold it. Okay. And you don't remember
11 when you sold that?

12 A. I don't remember the year.

13 Q. Was it before or after you built the 192 Stone
14 Ridge Lane property?

15 A. It would have been right about the same time.

16 Q. Okay. So at some point in time you sold 184
17 West Mud Pike. Correct?

18 A. Yes.

19 Q. Okay. And you bought -- or excuse me. You
20 built 192 Stone Ridge Lane?

21 A. About the same time, yes.

22 Q. Okay. And you were a co-owner of 192 Stone
23 Ridge Lane?

24 A. Yes.

25 Q. Okay. So at all times since 2014 you've owned

Transcript of Angela Svonavec
Conducted on November 4, 2024

31

1 property in Pennsylvania. Is that correct?

2 A. Yes.

3 Q. Okay. I believe I asked you this earlier, but
4 since I'm not 100% sure, Jason Svonavec did not file a
5 declaration of domicile. Is that right?

6 A. Correct.

7 Q. Why not?

8 A. He lives in Pennsylvania.

9 Q. So since 2014 you've lived in a different state
10 than your husband?

11 A. Uh-huh.

12 Q. Okay. And at no time since 2014 were you and
13 Jason separated in your marriage?

14 A. No, we haven't been.

15 Q. Okay.

16 A. By distance. Not legally.

17 Q. How often do you see your husband?

18 A. He comes pretty frequently to visit.

19 Q. On average?

20 A. Every other week. Every other weekend.

21 Q. So he's a resident of Pennsylvania, but he
22 comes here approximately every other week?

23 A. Yeah, every other weekend usually. He -- for
24 years he had to be feet on the ground in Pennsylvania to
25 work.

Transcript of Angela Svonavec
Conducted on November 4, 2024

32

1 Q. Because of jobs?

2 A. Uh-huh.

3 Q. Okay.

4 A. And I could work from anywhere with mine.

5 The -- yeah. So he -- he travels down a lot.

6 Q. And what -- is there a time of the year that
7 you typically are in Florida?

8 A. Yeah. I'm always here September through May
9 and usually the month of July.

10 Q. September to May and the month of July?

11 A. Uh-huh.

12 Q. Okay. All right. Now, we talked a little bit
13 about the 192 Stone Ridge Lane property. Have you ever
14 resided at 192 Stone Ridge Lane?

15 A. 19 -- no, not resided. I stay there when I go
16 up.

17 Q. That was built during the time that you resided
18 in Florida?

19 A. Uh-huh.

20 Q. Let me show --

21 MR. COLIN: While Mr. Krasik is getting
22 that ready, make sure when you answer if you're going to
23 say yes, you say yes and not uh-huh.

24 THE WITNESS: Okay.

25 MR. COLIN: Because it's very difficult for

Transcript of Angela Svonavec
Conducted on November 4, 2024

33

1 everybody to understand looking back on that. I think
2 Mr. Krasik would agree with that.

3 MR. KRASIK: It's good -- good instruction.

4 Q. (BY MR. KRASIK) I'm showing you what I've
5 marked as Exhibit 4, Ms. Svonavec.

6 (Deposition Exhibit No. 4 marked)

7 Q. (BY MR. KRASIK) This is a document you
8 produced that appears to be a 2019 loan interest
9 statement. Do you see that?

10 A. Uh-huh. Yes.

11 Q. Okay. And did you claim a home mortgage
12 interest deduction on your 2019 tax returns?

13 MR. COLIN: Object to form.

14 A. I have never heard of this bank. And what year
15 are we saying?

16 Q. (BY MR. KRASIK) See if I have that. Well,
17 this is -- if you look at this document, it is --

18 A. 2019.

19 Q. -- dated 2019. Yes.

20 A. I'm not familiar with this at all. This bank.

21 Q. Okay.

22 A. It has me Beagle Road.

23 Q. Did you provide documents to your attorneys to
24 be produced to us in this case?

25 A. I did not provide this. I've never seen this.

Transcript of Angela Svonavec
Conducted on November 4, 2024

34

1 Q. Okay. Do you -- do you see the Bates -- what
2 we call the number at the bottom, that's what we lawyers
3 call Bates numbers.

4 A. Uh-huh.

5 Q. Do you see it's marked BANS01844?

6 A. Yes.

7 Q. Okay. I would represent to you that it was
8 produced by your attorneys to us in this litigation.

9 MR. COLIN: I -- I agree that our office
10 produced these documents. What I will note for the
11 record is that Ms. Svonavec is not a Defendant in this
12 or is not a party to this matter. These are corporate
13 parties, and so it's entirely possible -- and I don't
14 know this, but it's entirely possible that the office of
15 Banshee or the office of Heritage Holdings produced this
16 without her knowledge.

17 MR. KRASIK: That's fine. That --

18 Q. (BY MR. KRASIK) Your testimony, Ms. Svonavec,
19 is that you don't recall seeing this document before?

20 A. I've never seen it.

21 Q. Okay. Do you know -- well, let me first direct
22 your attention. This is a loan interest -- 2019 loan
23 interest statement. Do you see that?

24 A. Yes.

25 Q. Okay. Do you know on what -- oh, before I get

Transcript of Angela Svonavec
Conducted on November 4, 2024

35

1 there. And a couple lines down, it lists a note number,
2 note date, maturity date, current interest rate. Do you
3 see that?

4 A. Yes.

5 Q. Okay. Do you know on what property this
6 interest -- this mortgage was taken?

7 A. I do not.

8 MR. COLIN: Object to -- object to form.
9 Now answer.

10 A. I do not.

11 Q. (BY MR. KRASIK) Okay. Well, let me ask this.
12 Was it -- was it a loan taken on your Florida property?

13 MR. COLIN: Object to form.

14 A. Not to my knowledge.

15 Q. (BY MR. KRASIK) Do you recall that you paid
16 cash? You bought your Florida property. There was no
17 mortgage on it. Right?

18 A. I don't recall.

19 Q. Okay. We'll look at that in a little bit. So
20 your testimony today is you don't know on what property
21 the loan interest -- well, let me ask another question.

22 Do you know what the loan that the -- is
23 referred to in this document, what kind of loan it is?

24 MR. COLIN: Object to form.

25 A. I do not.

Transcript of Angela Svonavec
Conducted on November 4, 2024

36

1 Q. (BY MR. KRASIK) Okay. Do you see your name
2 identified on this document?

3 A. I do.

4 Q. Okay. And it identifies you at the address 550
5 Beagle Road, Rockwood? Do you see that?

6 A. Right. That --

7 MR. COLIN: Object to form.

8 Q. (BY MR. KRASIK) The question was, do you see
9 that?

10 MR. COLIN: No, the question was it
11 identifies you at.

12 MR. KRASIK: Oh.

13 MR. COLIN: No, we will stipulate that this
14 paper says 550 Beagle Road, Rockwood, 155 --

15 MR. KRASIK: I just want to make sure we
16 could agree on that one.

17 MR. COLIN: Absolutely. Without question.

18 Q. (BY MR. KRASIK) All right. So this
19 document --

20 A. I've never resided at 550 Beagle Road.

21 Q. I was not suggesting that you did. What is 550
22 Beagle Road?

23 A. That is the farm address, Banshee Farms, but
24 it's also a mailing address for a lot of the businesses.
25 It's like the main mail -- mailbox, if you will say.

Transcript of Angela Svonavec
Conducted on November 4, 2024

37

1 Q. Okay. 550 Beagle Road is a farm?

2 A. It is a farm.

3 Q. Is there a building on that property?

4 A. A lot of buildings.

5 Q. Okay.

6 THE VIDEOGRAPHER: I'm so sorry. Can I
7 have the witness move her hair off to the side?

8 THE WITNESS: Sorry. I could do a pony --

9 MR. COLIN: Ponytail.

10 THE WITNESS: I was going to say, I don't
11 have a thing, but I will -- if anybody has one I'll tie
12 it back.

13 Q. (BY MR. KRASIK) So 550 Beagle Road is a farm?

14 A. Uh-huh.

15 Q. And there are a number of buildings on that
16 property?

17 A. Correct.

18 Q. Okay. Is one of those buildings used as an
19 office?

20 A. A scale house.

21 Q. What is a scale house?

22 A. Where corn -- like, grain is weighed, coal is
23 weighed. Like where something is weighed.

24 Q. Okay.

25 A. A scale house --

Transcript of Angela Svonavec
Conducted on November 4, 2024

38

1 Q. So --

2 A. -- with certified scales.

3 Q. Sorry to interrupt you. Thank you.

4 I believe you also said that 550 Beagle
5 Road is used as a mailing address for a number of
6 businesses. Is that right?

7 A. Correct.

8 Q. But there's no office there?

9 A. There's no office.

10 Q. Does anybody work there?

11 A. Yes.

12 Q. Does anybody work there not working on the
13 farm?

14 MR. COLIN: Object to form.

15 A. I don't know, actually.

16 Q. (BY MR. KRASIK) So there's farm work being
17 done there?

18 A. There is.

19 Q. Okay. Is there any other work being done
20 there?

21 A. I don't know.

22 Q. Okay. Well, what are some of the businesses
23 that you use 550 Beagle Road as a mailing address for?

24 A. Off the top of my head, I believe -- I believe
25 Fearless Leasing.

Transcript of Angela Svonavec
Conducted on November 4, 2024

39

1 Q. Uh-huh.

2 A. And Banshee Industries mail there and maybe not
3 anymore. You know, I never get the mail, so I honestly
4 don't know. The -- Jason would know those answers. He
5 gets the mail.

6 Q. Well, let's start with Banshee Industries. Are
7 there employees of Banshee Industries?

8 A. There are employees of Banshee Industries.

9 Q. Okay. Where do they work?

10 A. Some are mobile and some work in Meyersdale.

11 Q. In Meyersdale?

12 A. Uh-huh.

13 Q. Those employees that work at Meyersdale, where
14 do they work?

15 A. At an office in Meyersdale through --

16 Q. And what is that address?

17 A. 338 Industrial Park Road.

18 Q. 338 Industrial Park Road?

19 A. Yeah.

20 Q. Okay. So the employees of -- some employees of
21 Banshee Industries, LLC, work at 338 Industrial Park
22 Road?

23 A. Correct.

24 Q. Okay. But that's not the mailing address for
25 Banshee Industries, LLC?

Transcript of Angela Svonavec
Conducted on November 4, 2024

40

1 A. It wasn't originally, but there -- I believe
2 they have a mailbox there now.

3 Q. Well, on official correspondence what is the
4 mailing address for Banshee Industries, LLC?

5 A. I don't know. I don't handle that.

6 Q. In your complaint in this lawsuit do you know
7 the address that's identified as the address of Banshee
8 Industries?

9 A. I don't.

10 Q. Okay. I will represent to you it's 550 Beagle
11 Road.

12 A. Okay.

13 Q. So Banshee Industries -- do you have a position
14 with Banshee Industries?

15 A. No.

16 Q. No?

17 A. Well, I'm an owner.

18 Q. Owner. Okay. Do you have -- other than being
19 an owner, do you have a position?

20 A. Not a title, no.

21 Q. Okay.

22 A. Just owner, managing member.

23 Q. And you're an owner. We'll talk about this
24 more later, but this is -- are there any other owners?

25 A. No.

Transcript of Angela Svonavec
Conducted on November 4, 2024

41

1 Q. Okay. And what's the nature of the business of
2 Banshee Industries, LLC?

3 A. Banshee Industries sells mulch, stone, house
4 coal, propane, heating products to the public.

5 Q. And does it have operations in Pennsylvania?

6 A. Yes.

7 Q. Okay. Does it have operations in Florida?

8 A. No.

9 Q. Okay. I think you mentioned Fearless Leasing,
10 LLC?

11 A. Yes.

12 Q. And that has a mailing address at 550 Beagle
13 Road as well?

14 A. I believe so.

15 Q. Okay. Does Fearless Leasing, LLC, have
16 employees?

17 A. All -- well, the way the companies are set up,
18 all the employees are hired through Banshee Industries,
19 and then there are intercompany, like, agreements --

20 Q. Uh-huh.

21 A. -- where the employees work for the different
22 companies.

23 Q. Okay.

24 A. They're owned by me. So, yes, they have
25 employees, but they're -- they're employees of Banshee

Transcript of Angela Svonavec
Conducted on November 4, 2024

42

1 Industries with roles at Fearless Leasing --

2 Q. Gotcha.

3 A. -- if that makes sense.

4 Q. And what is the nature of the business of
5 Fearless Leasing, LLC?

6 A. Fearless Leasing is equipment rental and sales.

7 Q. And does Fearless Leasing, LLC, have operations
8 in Pennsylvania?

9 A. Yes.

10 Q. Does Fearless Leasing, LLC, have operations in
11 Florida?

12 A. Yes.

13 Q. What are those operations?

14 A. Here out of -- out of my office here in Naples.

15 Q. Okay. What do you do out of your office here
16 in Naples for Fearless Leasing, LLC?

17 A. Buy and sell equipment.

18 Q. Do you have customers in Florida?

19 A. I have vendors in Florida.

20 Q. You have vendors in Florida from whom you buy
21 equipment?

22 A. Or rent or lease.

23 Q. Or rent or lease equipment?

24 A. Uh-huh.

25 Q. Who are those?

Transcript of Angela Svonavec
Conducted on November 4, 2024

43

1 A. I have -- it -- and there are often auctions,
2 so Ritchie Brothers, who are really based out of
3 Vancouver, but they have the largest -- I think their
4 largest auction site in Pennsylvania -- or not
5 Pennsylvania -- in the U.S. is here in Florida in the
6 Kissimmee area.

7 Q. What does that -- when you say an auction site,
8 what -- what does -- what does that mean?

9 A. They auction equipment.

10 Q. At this site in Kissimmee, Florida?

11 A. Yes, and Jack Lyons.

12 Q. Is that a different one?

13 A. Uh-huh.

14 Q. Jack Lyons?

15 A. Uh-huh.

16 Q. Ritchie Brothers and Jack Lyons sell or
17 lease --

18 A. They sell.

19 Q. -- equipment? Sell?

20 A. They sell. They're auction -- auctioneers.

21 Q. Any others?

22 A. There's a CAT dealer down here. I'm not the
23 one that directly deals with them, but we have a local
24 CAT dealer.

25 Q. Do you have a CAT dealer in Pennsylvania?

Transcript of Angela Svonavec
Conducted on November 4, 2024

44

1 A. Yes.

2 Q. Any others?

3 A. Not off the top of my head.

4 Q. Okay. I believe you also mentioned Fearless
5 One, Inc., as having a mailing address at 550 Beagle --
6 withdrawn. Let me back up.

7 Why does Fearless Leasing, LLC, use 550
8 Beagle Road as a mailing address?

9 MR. COLIN: Object to form.

10 A. Simplicity. I just like to have all the mail
11 delivered to my accountants and -- and lawyers.
12 Everybody -- it's collected at one site and then sent to
13 the proper offices.

14 Q. (BY MR. KRASIK) And at that one site, nobody
15 is working on this business?

16 MR. COLIN: Object to form.

17 A. I wouldn't say that's completely accurate,
18 because Banshee Industries hires all the employees and
19 so they work at different locations.

20 Q. (BY MR. KRASIK) Do any of those locations
21 include 550 Beagle Road?

22 A. On occasion.

23 Q. What does that mean, on occasion?

24 A. Every day is different at work, so if a piece
25 of equipment maybe breaks down, they'll use the site

Transcript of Angela Svonavec
Conducted on November 4, 2024

45

1 there for repairs, washing, weighing, whatever needs
2 done.

3 Q. Okay. But not in an office there?

4 A. There's not an office.

5 Q. The farm work that's done at 550 Beagle Road,
6 what business is that for?

7 A. The farm work that's done there is for the
8 farm, Banshee Farms.

9 Q. That's Banshee Farm. Is that Banshee Crane and
10 Farm, LLC?

11 A. Well, it was changed years ago, but it's just
12 Banshee Farms now.

13 Q. Okay. And what's the business of Banshee
14 Farms?

15 A. It is a farm.

16 Q. It's a farm. And what does it sell?

17 A. Beef mostly. There's cattle and a lot of -- a
18 lot of hay production and hay for -- before that was
19 grain. It -- it varies through the years, but it's all
20 farming.

21 Q. Okay. And are you an owner of Banshee Farms?

22 A. I am the owner, yes.

23 Q. You're the owner. Okay. And I didn't ask you.
24 Are you the -- an owner of Fearless Leasing, LLC?

25 A. I am the owner, yes.

Transcript of Angela Svonavec
Conducted on November 4, 2024

46

1 Q. Okay. And Banshee Farms has operations in
2 Pennsylvania. Right?

3 A. Yes.

4 Q. Okay. Does it have operations in Florida?

5 A. No.

6 Q. Okay. I started to ask you, I think, about
7 Fearless One, Inc. Does Fearless One, Inc., have a
8 mailing address at 550 Beagle Road?

9 A. It -- the mailing address for Fearless One is
10 Delaware.

11 Q. Is Delaware?

12 A. Uh-huh.

13 Q. What's the business of Fearless One, Inc.?

14 A. It is the -- like the holding company -- or I
15 don't know if holding company is the right word. It
16 owns the planes. It's all aviation.

17 Q. Okay. So it doesn't sell any goods or
18 services?

19 MR. COLIN: Object to form.

20 Q. (BY MR. KRASIK) Does it sell any goods or
21 services?

22 A. I'm not sure how to answer the question. It
23 has -- it leases the plane. So is that selling -- I
24 don't know what that means. It leases a plane.

25 Q. Okay. It doesn't do anything else?

Transcript of Angela Svonavec
Conducted on November 4, 2024

47

1 A. I don't believe so.

2 Q. Okay. And are you an owner of Fearless One,
3 Inc.?

4 A. Yes.

5 Q. Are you the owner of Fearless One, Inc.?

6 A. I believe so. I'm not 100% sure.

7 Q. Okay. Do you have a company called Banshee
8 Crane and Erection, LLC?

9 A. No.

10 Q. Okay. Did you used to have that company -- or
11 a company with that name?

12 A. There was a farm called Banshee -- I mean, the
13 farm used to be called Banshee Crane and Farm.

14 Q. Okay.

15 A. Yeah.

16 Q. But Crane and Erection, LLC?

17 A. It was never its own company, no.

18 Q. Okay.

19 A. No.

20 Q. Did you -- do you have any interest in a
21 company called Bandit Equipment Operations, LLC?

22 A. No.

23 Q. Did you ever?

24 A. No. Not that I'm aware of.

25 Q. Okay. Heritage Holding Company, is its mailing

Transcript of Angela Svonavec
Conducted on November 4, 2024

48

1 address at 550 Beagle Road?

2 A. I'm not sure.

3 Q. Okay. And do you own Heritage Holding Company?

4 A. Yes.

5 Q. Are you the sole owner?

6 A. Yes.

7 Q. All right. Other than what we've talked about,
8 do you -- are there any other companies that have a
9 mailing address at 550 Beagle Road?

10 A. I don't know.

11 Q. Okay. Besides 550 Beagle Road and 192 Stone
12 Ridge Lane, do you own any other property in
13 Pennsylvania?

14 A. Yes. The 338 Industrial Park Road, I would
15 own. And quite -- quite a bit of land, but I don't know
16 the addresses --

17 Q. Okay.

18 A. -- to provide you. I'm sorry.

19 Q. No, that's fine. 338 Industrial Park Road, in
20 what name is that owned?

21 A. That -- through my company, through Ban --
22 well, I'm not sure how it's titled, to be honest, but
23 that's --

24 Q. That was my -- that was my real question. I'm
25 sorry to interrupt you, but, yes.

Transcript of Angela Svonavec
Conducted on November 4, 2024

49

1 A. Yeah, I don't know, but Banshee Industries, the
2 offices are there, but I don't know how it is titled or
3 deeded, whatever that word would be.

4 Q. I'll take either one. Thank you.

5 And the other property that you own, do you
6 know who is the owner of that property?

7 A. The farm just recently purchased some
8 property -- or acquired it. Some would be in my -- mine
9 and Jason's name jointly, and some would be owned by the
10 farm, Banshee Farms. That should be -- that should be
11 the only ways that they're titled.

12 Q. I'm not sure I asked you. I should have. Who
13 owns the property at 550 Beagle Road?

14 A. The -- I believe -- well, I don't know. I'm
15 not sure.

16 Q. Do you have a bank account at First National
17 Bank in Somerset?

18 A. The Wealth Management portion I have. But I
19 don't think there's -- I don't have a personal account
20 there. I mean, just the Wealth Management.

21 Q. Meaning they handle your Wealth Management?

22 A. Uh-huh.

23 Q. Okay. In whose name is the account?

24 A. Mine. They're out of Johnstown, Pennsylvania.

25 Q. So you have an account in your name for Wealth

Transcript of Angela Svonavec
Conducted on November 4, 2024

50

1 Management at First National?

2 A. FNB Wealth Management in Johnstown, PA.

3 Q. Okay. But that's not a checking account,
4 you're saying? That's the distinction you make?

5 A. They're separate. I don't know if they're
6 affiliated anymore. I mean, I think there's some
7 affiliation between the branch and the Wealth
8 Management, but I deal only on the Wealth Management
9 side.

10 Q. Okay. Do you have a checking account at FNB?

11 A. I don't know. Not that I'm aware of.

12 Q. Okay.

13 MR. KRASIK: We're going to need an answer
14 on that one, Chadd.

15 Q. (BY MR. KRASIK) So we'll leave a space in the
16 deposition to fill that in when you get the answer.
17 Okay?

18 A. Uh-huh.

19 (Please information on page 186)

20 Q. (BY MR. KRASIK) Do you belong to any country
21 clubs or social clubs in Pennsylvania?

22 A. No, not that I'm aware of.

23 Q. Have you in the past?

24 A. Not in Pennsylvania. I've never had, like,
25 leisurely free time, so I'm not really much of a club

Transcript of Angela Svonavec
Conducted on November 4, 2024

51

1 joiner.

2 Q. Just asking the question. All right.

3 MR. KRASIK: We've been going about an
4 hour. We can take a break, if you want, for a few
5 minutes.

6 MR. COLIN: Would you like to take a break
7 or would you like to keep going?

8 THE WITNESS: I'm fine either way.

9 MR. KRASIK: Okay. We'll keep going then.

10 Q. (BY MR. KRASIK) I believe you said earlier
11 that Sydney was born in 1999?

12 A. Yes.

13 Q. Okay. So would it be fair to say in 2014 she
14 was 15?

15 A. Probably, yes.

16 Q. Okay. And in -- at 15, she was in ninth or
17 tenth grade?

18 A. Probably tenth.

19 Q. Okay. Where did Sydney reside from 2014
20 through the end of high school?

21 A. She lived with her dad, Travis. And it --
22 yeah.

23 Q. So you resided in Florida, but she resided in
24 Pennsylvania?

25 A. Correct. She -- she didn't want to relocate

Transcript of Angela Svonavec
Conducted on November 4, 2024

52

1 schools.

2 Q. And what high school, I guess, did she attend?

3 A. Rockwood.

4 Q. And earlier you told me that you had a custody
5 arrangement that was shared, but you had her pretty much
6 all week except for Friday to Saturday?

7 A. Uh-huh.

8 Q. But that changed?

9 A. Uh-huh. Yes.

10 Q. Okay. Did it formally change? Did you change
11 it with the Court?

12 A. I don't believe it changed with the Court, but
13 I -- I don't believe it did.

14 Q. Okay.

15 A. Because it -- it was pretty relaxed at that
16 time. We, you know, didn't have to go seek intervention
17 for who Sydney got to spend time with. Plus, at a
18 certain age I think they get to make up their own mind.

19 Q. Okay.

20 A. Yeah.

21 Q. But so from 2014 through the end of her high
22 school, you resided in different states from your
23 daughter?

24 A. Yes.

25 Q. Okay. How often did you see her?

Transcript of Angela Svonavec
Conducted on November 4, 2024

53

1 A. Oh, I don't recall exactly. But we -- we spoke
2 often on the phone.

3 Q. Did you ever go to one of her parent/teacher
4 conferences?

5 A. When -- in high school, no.

6 Q. What activities did Sydney do in high school?

7 A. Soccer and track.

8 Q. Did you go to any soccer games of hers?

9 A. Not often -- I went to a few. And a few track.

10 Q. When is girls soccer season?

11 A. Soccer starts -- she was AYSO, so I feel like
12 that's over the summer.

13 Q. High school soccer, isn't that the fall?

14 A. Yeah. That starts in August and goes, I don't
15 know, maybe to October.

16 Q. Okay. And what about track?

17 A. Track's in the spring. So it would have been
18 in May.

19 Q. Okay.

20 A. Might start in April. If I was there it would
21 have been, you know, probably some of the May -- the end
22 of the season things.

23 Q. Okay. So earlier you told me that you lived in
24 Florida from September to May?

25 A. Uh-huh.

Transcript of Angela Svonavec
Conducted on November 4, 2024

54

1 Q. And July. Do you recall that?

2 A. Yeah.

3 Q. Okay. So when you would go to her soccer games
4 you were obviously in Pennsylvania between September and
5 May. Right?

6 A. Well, soccer would have been in August.

7 Q. And through October, November?

8 A. But I probably didn't get up to the games then.
9 That's what I mean by just a few.

10 Q. Okay.

11 A. I mean, in her whole career I was probably
12 lucky to see a dozen games in her entire career, but I
13 worked a lot too.

14 Q. I understand. Sydney has a Florida driver's
15 license, doesn't she?

16 A. Uh-huh.

17 Q. When did she get that?

18 A. I don't recall when.

19 Q. So she has a Florida driver's license, but
20 she's a Pennsylvania resident. Right?

21 MR. COLIN: Object to form.

22 A. She was eligible because I was a Florida
23 resident and she would come here and stay. She took her
24 tests here. I took her to Orange Blossom for her test.

25 Q. (BY MR. KRASIK) Okay. So she has a Florida

Transcript of Angela Svonavec
Conducted on November 4, 2024

55

1 driver's license?

2 A. Not anymore.

3 Q. She doesn't?

4 A. Not any longer. Sydney doesn't. No. When she
5 went to college she got rid of it. She went -- she
6 switched it for a PA. She attended college at Duquesne
7 in Pittsburgh.

8 Q. Uh-huh.

9 A. So she just had probably just a few years of a
10 Florida resident. And -- or not a Florida resident, a
11 Florida driver's license, and then she switched it to
12 Pennsylvania.

13 Q. Okay. And your testimony is she no longer has
14 a Florida driver's license?

15 A. Correct.

16 Q. Okay.

17 A. She's -- yeah, she's 25 or something like that
18 right now. She's -- hasn't had Florida residence -- or,
19 I mean, a Florida driver's license since -- what year
20 did she graduate -- 2017.

21 Q. Okay. Earlier you said that Spencer was born
22 in 2003. So in 2014 he was 11?

23 A. That sounds right.

24 Q. Okay. Where did he reside from 2014 through
25 the end of his high school?

Transcript of Angela Svonavec
Conducted on November 4, 2024

56

1 A. Mostly with me here.

2 Q. In Florida?

3 A. Yes.

4 Q. What schools did he go to?

5 A. He home schooled.

6 Q. He home schooled from 2014 through the end of
7 high school?

8 A. Uh-huh, yes.

9 Q. Currently Spencer resides in Pennsylvania.
10 Right?

11 A. Yes.

12 Q. When did that start?

13 A. Well, I don't know exactly. He just switched
14 his driver's license in September. But after he
15 graduated he bought his own company and moved back to
16 Pennsylvania, so like -- like three years ago. He
17 graduated early. Probably three years ago.

18 Q. After he graduated high school?

19 A. Yes.

20 (Deposition Exhibit No. 5 marked)

21 Q. (BY MR. KRASIK) I'll show you what's marked
22 Exhibit 5.

23 MR. COLIN: Thank you.

24 Q. (BY MR. KRASIK) This is a record from the
25 Florida Department of State indicating that Spencer

Transcript of Angela Svonavec
Conducted on November 4, 2024

57

1 Jason Svonavec is registered to vote in Florida. Do you
2 see that?

3 A. Yes.

4 Q. Okay. Did you understand he's still registered
5 to vote in Florida?

6 A. He's not anymore. He is registered -- as of
7 September, he registered in Pennsylvania.

8 Q. As of September 2024?

9 A. This September, yes.

10 Q. I'm not sure the Florida Department of State
11 knows that, but your testimony is that he registered to
12 vote in Pennsylvania?

13 A. That's what he told me. Yes.

14 Q. Okay. So it would be news to you if he was
15 still registered to vote in Florida?

16 A. Correct.

17 MR. COLIN: Excuse me.

18 Q. (BY MR. KRASIK) Do you have a passport,
19 Ms. Svonavec?

20 A. I do.

21 Q. What address is on the passport?

22 A. 5792 Clarendon Drive. And that's been since
23 2014.

24 Q. Okay.

25 A. Or -- well, it's been Florida since 2014. It

Transcript of Angela Svonavec
Conducted on November 4, 2024

58

1 was Portside before and then I updated it.

2 MR. KRASIK: We'd like a copy of the
3 passport whenever you get a chance after this.

4 Q. (BY MR. KRASIK) And is your cell phone still
5 814-233-0016?

6 A. Correct.

7 Q. Okay. 814 is the area code in Somerset. Is
8 that right?

9 A. Correct. It's a business phone.

10 Q. 814-233-0016 is a business phone?

11 A. Uh-huh. All the -- it all goes through the
12 same account with the company.

13 Q. Do you have a separate cell phone --

14 A. I don't.

15 Q. -- personally?

16 MR. KRASIK: All right. Let's go off for a
17 brief break, please. Can we go off? Can we go off?

18 THE VIDEOGRAPHER: We are going off the
19 record. The time is 10:31 a.m.

20 (Recess from 10:31 a.m. to 10:39 a.m.)

21 THE VIDEOGRAPHER: We are back on the
22 record. The time is 10:39 a.m.

23 Q. (BY MR. KRASIK) Ms. Svonavec, earlier, you had
24 said that Spencer lived with you in Florida after 2014.
25 When did he begin to live with you in Florida?

Transcript of Angela Svonavec
Conducted on November 4, 2024

59

1 A. Immediately.

2 Q. So 2014?

3 A. Yes.

4 Q. Okay. And he was -- what did we say, '03, so
5 11 at the time?

6 A. Yeah, around. Would that be fourth or fifth
7 grade?

8 Q. Right.

9 A. Yeah.

10 Q. So what school was he attending previously?

11 A. Rockwood.

12 Q. Rockwood. And that -- Rockwood in
13 Pennsylvania?

14 A. Correct.

15 Q. Okay. And he left whatever school -- was it --
16 let me ask, was it an elementary school at the time or a
17 middle school?

18 A. Rockwood. Yeah, K-12 is all in the same
19 building, Rockwood.

20 Q. Oh, so K-12. Okay.

21 So your testimony is he left Rockwood in
22 2014 and came to live with you in Florida and was home
23 schooled?

24 A. Correct.

25 Q. Is there a -- a diploma or something that one

Transcript of Angela Svonavec
Conducted on November 4, 2024

60

1 gets from home schooling?

2 A. Uh-huh. It's -- so it's through Cyber School.
3 So, yes, he does.

4 Q. And he has a Cyber School diploma?

5 A. Yes. I assume. I've not actually seen it.
6 But I'm sure it does.

7 Q. Pennsylvania has a Cyber School too. Correct?

8 A. Yes. What that -- he did do -- because Jason,
9 his father, was a resident of Pennsylvania, he
10 qualified.

11 Q. Uh-huh.

12 A. So there was a lot of documentation that --
13 because of him living with me, but if one parent is a
14 resident of the state, they're able to do the Cyber
15 School --

16 Q. Okay.

17 A. -- of that state.

18 Q. He was enrolled in Cyber School in
19 Pennsylvania?

20 A. PA Cyber and he did it remotely from here.

21 Q. Since this was Cyber School it was all online?

22 A. Yes.

23 Q. Okay. And which means he could do it from
24 Pennsylvania or Florida. Right?

25 A. Or anywhere in between, yes.

Transcript of Angela Svonavec
Conducted on November 4, 2024

61

1 Q. Right. Would it be fair to say he did some of
2 his schooling in Pennsylvania?

3 A. Possibly -- probably not, because Jason would
4 not have helped him with it, so I would say no. I'd say
5 highly unlikely.

6 Q. Does Spencer have a bedroom at 192 Stone Ridge
7 Lane?

8 A. Well, Spencer has his own home.

9 Q. Now?

10 A. Yeah.

11 Q. Let's say from 2014 to when he -- to the end of
12 high school, did he have a bedroom?

13 A. Somewhere in Pennsylvania, yes, he would have
14 always had it --

15 Q. Yes.

16 A. -- whether it was at Mud Pike or Stone Ridge.

17 Q. Thank you for clarifying that.

18 A. Yeah.

19 Q. Okay. All right. You currently live in
20 Florida at 5 -- 5792 Clarendon Drive?

21 A. Correct.

22 (Deposition Exhibit No. 6 marked)

23 MR. KRASIK: I'm terrible with these
24 things.

25 MR. COLIN: Thank you.

Transcript of Angela Svonavec
Conducted on November 4, 2024

62

1 MR. KRASIK: Sure.

2 Q. (BY MR. KRASIK) Showing you what I've marked
3 as Exhibit 6, which is the deed for 47 -- 5792 Clarendon
4 Drive.

5 A. Yes.

6 Q. Have you seen this before?

7 A. Yes.

8 Q. Okay. And this memorializes that you purchased
9 this house with your husband, Jason?

10 A. Yes.

11 Q. Okay.

12 A. '21.

13 Q. And the purchase date is February 26th, 2021?

14 A. Yes.

15 Q. Okay. At the end of that first paragraph of
16 the warranty deed, do you see that it identifies yours
17 and Jason's post office address at 550 Beagle Road,
18 Rockwood, PA?

19 A. I can't see where that is, but I trust you that
20 it does say that. Yes. Yes, there, I see it.

21 Q. Okay. At the time you bought the 5792
22 Clarendon Drive house, you were living at 796 Portside
23 Drive. Right?

24 A. Yes -- yes. I'm trying to remember the exact
25 timing. If I -- if I moved first and still owned it and

Transcript of Angela Svonavec
Conducted on November 4, 2024

63

1 sold Portside right prior or if I sold Portside prior --
2 I can't remember, but basically came from one to the
3 next.

4 Q. Right. My question is, why is your address --
5 on the warranty deed to purchase 5792 Clarendon Drive,
6 you listed 550 Beagle Road in Rockwood as opposed to 796
7 Portside Drive?

8 A. Well, same reason as all the businesses.
9 Simplicity. We tend to use one mailing address to send
10 everything to and let the offices forward it to the
11 proper people.

12 Q. Okay.

13 (Deposition Exhibit No. 7 marked)

14 Q. (BY MR. KRASIK) Ma'am, I'm going to show you
15 what I've marked as Exhibit 7.

16 MR. KRASIK: Copy for you.

17 Q. (BY MR. KRASIK) Do you recognize this to be an
18 article from the Greater Cumberland Committee?

19 A. Yes.

20 Q. Okay. What is the Greater Cumberland
21 Committee?

22 A. Well, it is a multistate effort. It was
23 basically established to complete Route 219. So the
24 states of Pennsylvania, Maryland and West Virginia all
25 had vested interest in trying to get a highway to be

Transcript of Angela Svonavec
Conducted on November 4, 2024

64

1 completed. And I served on the board for a time.

2 Q. Okay. That was going to be my next question.
3 You served on the board of the Greater Cumberland
4 Committee?

5 A. Uh-huh.

6 Q. Okay. And this -- let's have the number. That
7 would help us out. This Exhibit 7, this is from -- if
8 you look at the date on the second page, February 10th,
9 2021. Correct?

10 A. Yes.

11 Q. Okay. And you were residing in Florida at the
12 time?

13 A. Yes.

14 Q. Okay. Did -- did you talk to the author of
15 this article in -- in preparation?

16 A. No, I didn't -- I didn't know that -- I don't
17 know where this was published, so --

18 Q. From your work as -- on the board of the
19 Greater Cumberland Committee --

20 A. I mean, I understand, but I don't know where
21 they published this information about me, if it was on
22 their website or in their -- like, I don't know.

23 Q. Okay. I was going to ask, did you understand
24 from your work on the committee that they have a
25 newsletter or periodic mailing or publication?

Transcript of Angela Svonavec
Conducted on November 4, 2024

65

1 A. Not necessarily. All of our meetings were
2 Zoom, so everybody just remoted in and discussed things
3 on Zoom. And so I -- we didn't get mailings. I didn't
4 receive a mailing, I guess I should say.

5 Q. Okay. And your testimony is you don't recall
6 talking to somebody in advance of this article coming
7 out?

8 A. No, I don't recall.

9 Q. Do you know how they got this information about
10 you?

11 A. I do not.

12 Q. Could you turn to the second page of the
13 article? The last sentence of the first paragraph says,
14 like many others in the industry, she, that refers to
15 Ms. Svonavec, shares a vision to carry on the noble
16 tradition of hard work and ingenuity that helped build
17 this great nation.

18 Do you recall telling the author that?

19 A. I don't recall that, but something similar to
20 that was on one of my websites.

21 Q. Okay.

22 A. So they may have snippeted (sic) it. I don't
23 know. It's not normally the way I speak about myself.

24 Q. Okay. If you look at the last paragraph of the
25 article, do you see it says, Angela is a native of

Transcript of Angela Svonavec
Conducted on November 4, 2024

66

1 Somerset County, PA, and has a deep respect for the work
2 ethic and integrity of the local residents?

3 A. Yes.

4 Q. Okay. Did you tell them that?

5 A. I definitely have a deep respect for work
6 ethic. So somehow --

7 Q. My question was, how would they know that
8 without you telling them that?

9 A. Well, I speak very proudly of anybody in the
10 farming and co-industries, because it's all I've done my
11 whole life. So I'd say they took that from me directly
12 somehow.

13 Q. Okay. Seeing that doesn't refresh your
14 recollection that you spoke to them in connection with
15 this publication or article?

16 A. No, not specifically.

17 Q. Okay. The last sentence of the article says,
18 with a drive and desire to serve, it is a high priority
19 for Angela that each of her companies be a valuable and
20 positive contribution to her local community. Do you
21 see that?

22 A. Yes.

23 Q. And that local community refers to Somerset.
24 Right?

25 MR. COLIN: Object to form.

Transcript of Angela Svonavec
Conducted on November 4, 2024

67

1 A. Well, I have companies everywhere, so the local
2 communities wherever I'm at, I want the impact to be
3 positive.

4 Q. (BY MR. KRASIK) Is it your sworn testimony
5 under oath you were not referring to Somerset there?

6 A. I didn't --

7 MR. COLIN: Object to form.

8 A. I didn't write this article.

9 Q. (BY MR. KRASIK) Does -- is it your sworn
10 testimony under oath that that does not refer to
11 Somerset?

12 MR. COLIN: Object to form. Asked and
13 answered. She said she didn't write it and she
14 doesn't --

15 MR. KRASIK: I asked a different question.

16 A. I --

17 MR. COLIN: She said -- hang on. She said
18 she didn't write it and she doesn't recall speaking with
19 the person who did.

20 MR. KRASIK: Okay.

21 MR. COLIN: So I don't know how we can
22 repute those words to her. So you can --

23 MR. KRASIK: I didn't -- that wasn't my
24 question.

25 MR. COLIN: Okay. Can you please restate

Transcript of Angela Svonavec
Conducted on November 4, 2024

68

1 the question for my benefit?

2 THE WITNESS: Yeah.

3 Q. (BY MR. KRASIK) Is it your testimony under
4 oath that the reference to local community there does
5 not refer to Somerset?

6 MR. COLIN: Okay. And I object to form.
7 She didn't write this and she didn't -- she said that
8 she didn't talk to a person who did. Subject to those
9 objections, you may answer.

10 A. I think that Somerset is included in that, but
11 it's not limited to Somerset County.

12 Q. (BY MR. KRASIK) What else is included?

13 A. It includes all the counties where I have
14 businesses, which have been West Virginia and Maryland
15 and here and anywhere I've ever had a business.

16 Q. Okay. Is it your --

17 A. I want my businesses to impact the communities
18 in a positive way. I think that's how any business
19 owner would feel. But it's not limited to Somerset
20 County.

21 Q. Do you -- as a business owner of coal and
22 mining companies in Pennsylvania, is it important that
23 you demonstrate support for those local communities?

24 A. Yes, and I'm also -- I owned companies in
25 mining in West Virginia and in Maryland. So I was in

Transcript of Angela Svonavec
Conducted on November 4, 2024

69

1 the tri state region, so all those local communities, I
2 think, are vitally important.

3 Q. Do you have any understanding that those
4 communities care about what you're doing in Florida?

5 MR. COLIN: Object to form. You can
6 answer.

7 A. I don't understand. If you could restate. I
8 don't understand what you mean.

9 Q. (BY MR. KRASIK) Does the Greater Cumberland
10 Committee have any interest in what you're doing in
11 Florida?

12 MR. COLIN: Object to form. You can
13 answer.

14 A. The -- the businesses I operate down here are
15 different than the highway that would be impacted for
16 these businesses.

17 Q. (BY MR. KRASIK) Uh-huh. Do you have any basis
18 to say that the Greater Cumberland County (sic) in
19 speaking of the local community was referring to
20 Florida?

21 MR. COLIN: Object to form. You can
22 answer.

23 A. I believe they're speaking about West Virginia,
24 Maryland and Pennsylvania.

25 Q. (BY MR. KRASIK) Okay.

Transcript of Angela Svonavec
Conducted on November 4, 2024

70

1 (Deposition Exhibit No. 8 marked)

2 Q. (BY MR. KRASIK) I'll show you what I've marked
3 as Exhibit 8.

4 A. Thank you.

5 Q. You see this is another publication from the
6 Greater Cumberland Committee?

7 A. Yes.

8 Q. Okay. And this one is dated June 8th, 2021?

9 A. Yes.

10 Q. Okay. So it's after the publication we just
11 looked at in Exhibit 7. Right?

12 A. Correct.

13 Q. All right. So does this refresh your
14 recollection that you spoke with someone from the
15 Greater Cumberland Committee before they wrote these
16 publications about you?

17 A. No, I don't recall ever being interviewed or --

18 Q. Okay. If I could direct your attention,
19 please, to the second page of the article, the last
20 paragraph, it says, Angela and her husband, Jason, are
21 natives of Somerset County, PA. Do you see that?

22 A. Yes.

23 Q. All right. Okay. But you resided at -- in
24 Florida as of February -- I'm sorry -- June 8th, 2021.
25 Correct?

Transcript of Angela Svonavec
Conducted on November 4, 2024

71

1 MR. COLIN: Object to form.

2 A. What does native mean?

3 MR. COLIN: Stop, stop, stop, stop.

4 Mr. Krasik's question was, you resided in Florida as of
5 some date in 2021.

6 MR. KRASIK: Correct.

7 MR. COLIN: And I don't believe that's
8 consistent with her testimony to this point. I believe
9 she said she resided in Florida much sooner than that.

10 Q. (BY MR. KRASIK) Oh. That's fine, but at least
11 as of June 8th, 2021, you were -- your claim is you were
12 residing in Florida?

13 A. Correct.

14 Q. Okay. Sorry if that wasn't clear. I was not
15 intending to suggest anything else.

16 MR. COLIN: We don't want to -- we don't
17 want to minimize her time as a Florida resident.

18 MR. KRASIK: I'm sure you don't.

19 Q. (BY MR. KRASIK) In writing that Angela and
20 Jason are natives of Somerset County, PA, did you inform
21 the Greater Cumberland Committee that you no longer
22 resided in Somerset County, PA?

23 A. Yes. They know I was born there in Somerset
24 County.

25 Q. And you remember telling them that you no

Transcript of Angela Svonavec
Conducted on November 4, 2024

72

1 longer resided in -- in Somerset?

2 A. Yeah, they are all very well aware that I lived
3 in Florida.

4 Q. Okay.

5 A. Because everyone vicariously made me have my
6 computer showing them the 360 of the --

7 Q. That you took meetings --

8 A. Yes.

9 Q. So you're saying they knew you were taking
10 meetings in Florida?

11 A. They knew that's where I lived, yes.

12 Q. Okay. So you remember telling them that, but
13 you don't remember if you talked to them in connection
14 with these articles?

15 A. I just remember because it was a topic of every
16 meeting whenever I would come on the screen. Please
17 show us your backyard, because it was always cold and
18 snowy in Somerset.

19 Q. You can put that aside. I'm showing you what
20 I've marked as Exhibit 9.

21 (Deposition Exhibit No. 9 marked)

22 Q. (BY MR. KRASIK) And, Ms. Svonavec, do you
23 recognize this as a UCC1 financing statement on behalf
24 of Heritage Holding Company, LLC?

25 A. Yes.

Transcript of Angela Svonavec
Conducted on November 4, 2024

73

1 Q. Okay. And this is recording interests in
2 property owned by Heritage Coal and Natural Resources,
3 LLC. Correct?

4 A. Yes.

5 Q. Okay. And this document was filed July 1,
6 2024?

7 A. Yes.

8 Q. If you look in the filed --

9 A. Yes, I see that. Yes.

10 Q. Okay. And on this document that was filed --
11 withdrawn.

12 This document was filed with the
13 Commonwealth of Pennsylvania. Correct?

14 A. Correct.

15 Q. All right. And so would it be fair to say you
16 had every intention of getting -- making sure the
17 information in this document was accurate?

18 MR. COLIN: Object to form. You can
19 answer.

20 A. I've not seen it before today.

21 Q. (BY MR. KRASIK) Okay. Would you want any
22 information filed on your behalf with the Commonwealth
23 of Pennsylvania Department of State to be accurate?

24 A. I would expect it to be.

25 Q. Okay. And this document was submitted by your

Transcript of Angela Svonavec
Conducted on November 4, 2024

74

1 attorneys at Morella & Associates. Correct?

2 A. It was.

3 Q. Okay. And the secured parties for this UCC1
4 filing statement are identified as Heritage Holding
5 Company, LLC, Angela Svonavec and Jason Svonavec. Do
6 you see that?

7 A. I do.

8 Q. Okay. And for Angela and Jason Svonavec, the
9 mailing address listed is 192 Stone Ridge Lane,
10 Rockwood. Correct?

11 A. That's how it's listed, but it's incorrect for
12 me.

13 Q. Okay. Because your position is at this time
14 you resided in Florida?

15 A. I do. Yes, I do.

16 Q. Okay. Do you have any understanding why it
17 would list 192 Stone Ridge Lane as your address at this
18 time?

19 A. Somebody made an error in the office.

20 Q. Okay.

21 A. I guess we should update it.

22 (Deposition Exhibit No. 10 marked)

23 Q. (BY MR. KRASIK) Let me show you what I've
24 marked as Exhibit 10. Do you recognize this as an
25 article from the Trib Democrat dated February 25th,

Transcript of Angela Svonavec
Conducted on November 4, 2024

75

1 2024?

2 A. Yes.

3 Q. Okay. And the Trib Democrat is a newspaper out
4 of Johnstown. Is that correct?

5 A. It -- yes, I don't know where they're out of,
6 but it's a -- it's definitely a newspaper. I thought it
7 was out of Pittsburgh.

8 Q. I -- it's not the Tribune Review. I actually
9 had to Google this to look it up and it seems to be --

10 A. Okay.

11 Q. -- out of Johnstown. Fair to say it's from the
12 Somerset County area?

13 A. Yeah. Well, Johnstown is Cambria County.

14 Q. Cambria. Okay. Pennsylvania?

15 A. Pennsylvania.

16 Q. Okay. And I do not think this is the Tribune
17 Review.

18 A. Okay.

19 Q. But -- but be that as it may, do you recall
20 being interviewed for this article?

21 A. Vaguely, yes. I -- I received a phone call. I
22 was actually here when I received the phone call.

23 Q. And do you recall what you were asked?

24 A. They were doing something about women in
25 business and they wanted to know if I could speak about

Transcript of Angela Svonavec
Conducted on November 4, 2024

76

1 two of my businesses.

2 Q. Okay. Which two were those?

3 A. They asked me to speak about the farm and the
4 coal company.

5 Q. So that's Banshee?

6 A. Uh-huh.

7 Q. -- and --

8 A. And Heritage -- at that time I still owned.

9 Q. -- Heritage?

10 A. Well --

11 Q. Probably right around the closing?

12 A. Yeah. Well, it must have printed -- I
13 definitely -- I definitely did interview -- so we sold
14 in February 5th of 2024. So this was printed evidently
15 after I was interviewed, because when I interviewed I
16 would have been the owner --

17 Q. Okay.

18 A. -- of Heritage Coal and Natural Resources, so
19 I'm not sure on this timing, but --

20 Q. Could you turn to -- well, feel free to refresh
21 yourself with the entire article.

22 A. Okay.

23 Q. But it's page -- I have it down as page 8 of
24 the article, which is -- I'll try to direct you more
25 specifically. It's under the heading, Not Giving Up.

Transcript of Angela Svonavec
Conducted on November 4, 2024

77

1 A. Okay. I see it. Yes.

2 Q. Okay. And if you go down to the third
3 paragraph under that heading, Not Giving Up, do you see
4 it says Svonavec, who resides half the year in Rockwood
5 and the other half in Naples, Florida, said she had
6 eight employees, et cetera, et cetera. Did you tell
7 this author that you reside half the year in Rockwood
8 and half in Naples, Florida?

9 A. Well, no. I mean, she would have maybe somehow
10 assumed that she -- I did not say that because that's
11 not actually true.

12 Q. Okay. Your testimony is what's in this
13 newspaper article is wrong?

14 A. Right. I didn't write that.

15 Q. And you say you didn't tell her that?

16 A. No. I didn't.

17 Q. Okay. Have you seen this article before?

18 A. I -- this morning I did actually.

19 Q. Before this morning?

20 A. No.

21 Q. Okay.

22 A. No, because I don't get this newspaper. I
23 don't actually get any newspaper.

24 Q. Okay. But your testimony today under oath is
25 that the author made up that line about you?

Transcript of Angela Svonavec
Conducted on November 4, 2024

78

1 MR. COLIN: Object to form. You may
2 answer.

3 A. Well -- right. I wouldn't say that she made it
4 up. I didn't proof anything. She asked a lot of
5 questions over the phone and I didn't get a proof. I
6 didn't see what she was writing up. So this wasn't
7 prepared by me and that's an error.

8 Q. (BY MR. KRASIK) The statement -- you're saying
9 she got that wrong?

10 A. That statement is wrong.

11 Q. Okay.

12 (Deposition Exhibit No. 11 marked)

13 Q. (BY MR. KRASIK) I show you what I've marked as
14 Exhibit 11. Do you recognize this as a letter you wrote
15 to Judge Bissoon in connection with your husband Jason's
16 sentencing hearing?

17 A. Yes, I did.

18 Q. Okay. And you addressed this letter to Judge
19 Bissoon?

20 A. Yes.

21 Q. Okay. And you wrote this on May 1, 2024?

22 A. Yes.

23 Q. Okay. And in writing this letter to Judge
24 Bissoon for this purpose, would it be fair to say that
25 you wanted everything you said in here to be accurate

Transcript of Angela Svonavec
Conducted on November 4, 2024

79

1 and correct?

2 MR. COLIN: Object to form. You may
3 answer.

4 A. Yes, I wanted to give her a very good view of
5 my husband of -- of his attributes to describe him to
6 the best that I could to somebody that doesn't know him.

7 Q. (BY MR. KRASIK) Uh-huh. If you would turn to
8 the very end of the letter, the last line in the letter
9 says, and I believe our local community needs Jason. Do
10 you see that?

11 A. Uh-huh.

12 Q. And that local community you're referring to is
13 Somerset, isn't it?

14 A. All of our communities. Again, we have
15 businesses everywhere. They need him.

16 Q. Your testimony under oath is that in writing,
17 and I believe our local community needs Jason, you are
18 not referring to Somerset?

19 MR. COLIN: Object to form. You may
20 answer.

21 A. I -- I did just answer. Not specifically to
22 Somerset.

23 MR. KRASIK: Could you read back the
24 question, please.

25 (Last question read by the reporter)

Transcript of Angela Svonavec
Conducted on November 4, 2024

80

1 MR. COLIN: Object to form. You can
2 answer.

3 A. And I'm saying not specifically Somerset. Our
4 local community.

5 Q. (BY MR. KRASIK) What are you referring to?

6 A. Everywhere we have a business or family or
7 anywhere we are active in supporting community.

8 Q. You believe this is referring to -- you
9 intended this to refer to Florida?

10 A. That's my -- no, my intention is for
11 everywhere.

12 Q. Including Florida?

13 A. Everywhere including Florida, including
14 Maryland, including West Virginia. Our community --
15 community to me -- your community is your like network.
16 The people in your community is not a location on a map.
17 When I say the coal community, the coal community is
18 broad. It's the coal community.

19 Q. Is there coal community in Florida?

20 A. There is a lot of retired coal community here
21 in Florida. Yes.

22 Q. Your testimony under oath is that the coal
23 community refers to Florida?

24 A. There isn't mining here, but --

25 MR. COLIN: Object to form. Object to

Transcript of Angela Svonavec
Conducted on November 4, 2024

81

1 form. You may answer.

2 A. There's not mining in Florida, as you well
3 know. There's not coal in the ground, but there is coal
4 community here.

5 Q. (BY MR. KRASIK) So in writing this sentence to
6 Judge Bissoon you intended local community to the extent
7 it related to local coal community to include Florida?

8 MR. COLIN: Object to form. You may
9 answer.

10 A. When I said local community, my intention --
11 and I'm the one writing the letter. Under oath before
12 God, my intention on community is everyone we -- that
13 needs Jason in our community.

14 Q. (BY MR. KRASIK) Uh-huh.

15 A. It's not specific to Somerset County. It's
16 specific to our community.

17 Q. This letter says, and I believe our local
18 community needs Jason. Jason was a resident of
19 Pennsylvania only. Right?

20 A. Right, but Jason has a much larger community.

21 Q. Okay. What's Jason's community?

22 A. The coal industry, the -- the equipment
23 industry, very, very big in the tractor pulling
24 industry. That is -- that is a huge community to him
25 and he is extremely active in that and gives back so

Transcript of Angela Svonavec
Conducted on November 4, 2024

82

1 much within that community it's unbelievable.

2 Q. And you intended all of that in writing, "our
3 local community needs Jason?"

4 MR. COLIN: Object to form. You may
5 answer.

6 A. I don't know how many more times I have to
7 answer it. My intention was our community.

8 Q. (BY MR. KRASIK) And that community includes
9 Florida?

10 MR. COLIN: Object to form. You may
11 answer.

12 A. Absolutely.

13 MR. COLIN: Mr. Krasik, I think we have our
14 answer.

15 Q. (BY MR. KRASIK) Showing you what I've marked
16 as Exhibit 12.

17 (Deposition Exhibit No. 12 marked)

18 Q. (BY MR. KRASIK) Ms. Svonavec, do you recognize
19 this as a motion for transfer of venue within the
20 district in connection with your husband Jason's
21 criminal case?

22 A. That's what this says, yes. I've never seen it
23 before.

24 Q. Okay. Would you please refer to paragraph 7 of
25 the document. The document says, the Defendant is a

Transcript of Angela Svonavec
Conducted on November 4, 2024

83

1 resident of Somerset -- Somerset County and believes
2 that all the witnesses in this case except law
3 enforcement witnesses on behalf of the government reside
4 in the Johnstown area. Do you see that?

5 A. Uh-huh.

6 Q. All right. Weren't you one of the witnesses in
7 this case?

8 MR. COLIN: Object to form. You may
9 answer.

10 A. I was not.

11 Q. (BY MR. KRASIK) Didn't you submit a character
12 witness letter on behalf of your husband?

13 A. I mailed a --

14 MR. COLIN: Object to form. You may
15 answer.

16 A. I mailed a letter, but I was not a witness that
17 day. There were witnesses that had to speak.

18 Q. (BY MR. KRASIK) You -- you were not a witness
19 at the sentencing hearing. Correct?

20 A. Correct.

21 Q. Right. But you did submit a character witness
22 letter in support of your husband. Correct?

23 A. Correct.

24 Q. Okay.

25 A. A lot of letters came from people all over the

Transcript of Angela Svonavec
Conducted on November 4, 2024

84

1 United States. This wasn't regarding letters. They
2 were talking about witnesses who had to come and
3 testify, I'm sure. This -- and this is sort of wrong,
4 because he's a resident of Rockwood in Somerset County,
5 but -- still the same.

6 Q. Uh-huh.

7 A. It's Somerset County.

8 Q. If you look at paragraph 10 of this, your --
9 Jason's lawyers refer to character witnesses?

10 A. Uh-huh. Yes.

11 Q. Including witnesses who would be unable to
12 attend the sentencing hearing if it were held in
13 Pittsburgh. Do you see that?

14 A. Yes.

15 Q. All right. So does that clarify for you that
16 this motion was referring to all witnesses including
17 those that submitted character witness letters like
18 yourself?

19 MR. COLIN: Object to form. You may
20 answer. It's pretty clear, Mr. Krasik, that she didn't
21 write this, but I will -- I will permit her to answer,
22 subject to my form objection.

23 A. Yeah. I didn't prepare it and I don't know
24 what they mean.

25 Q. (BY MR. KRASIK) Okay.

Transcript of Angela Svonavec
Conducted on November 4, 2024

85

1 A. But there were a lot of people from different
2 states that wrote, so it seems an error, if anything.

3 (Deposition Exhibit No. 13 marked)

4 Q. (BY MR. KRASIK) Showing you what I've marked
5 Exhibit 13.

6 MR. COLIN: Excuse me.

7 Q. (BY MR. KRASIK) Have you seen this letter
8 before?

9 A. I haven't, no.

10 Q. Okay. Do you recognize this as a letter from
11 the Rockwood Alliance Church in support of your husband
12 Jason's sentencing hearing?

13 MR. COLIN: Object to form. You may
14 answer.

15 A. Yes, that's what it says.

16 Q. (BY MR. KRASIK) Okay. Would it be fair to say
17 that you attended the Rockwood Alliance Church?

18 A. I have -- on occasion I have been there, yes.
19 That's my mom's church.

20 Q. It's your mom's church?

21 A. Uh-huh. Actually, she's not a member there,
22 but she attends almost every Sunday.

23 Q. And Rockwood Alliance Church is in Rockwood,
24 PA?

25 A. Yes.

Transcript of Angela Svonavec
Conducted on November 4, 2024

86

1 Q. Okay. Are you affiliated with any other
2 church?

3 A. I do. I attend church here. Where --
4 sometimes we go to other churches in -- if we're in
5 Pennsylvania.

6 Q. Okay. Do you see that the letter from Rockwood
7 Alliance Church says that his, meaning Jason's, family
8 has attended this church for many years and have been
9 active members of the community? Do you see that?

10 A. Yes.

11 Q. Okay. Do you think that's an accurate
12 statement?

13 A. Yes, and my mom has been there for many years.
14 And we have supported it. We've sent donations to that
15 church for many years.

16 Q. Okay. Has your family been active members of
17 the community?

18 MR. COLIN: Object to form.

19 A. Of the church community or -- I mean, both. I
20 would say, yes, everybody -- we gave actively there.

21 Q. (BY MR. KRASIK) Okay. And that community,
22 we're not sure what they meant? Could be the church
23 community, could be the local community?

24 A. Yeah, I didn't write -- I don't know
25 specifically what she means.

Transcript of Angela Svonavec
Conducted on November 4, 2024

87

1 Q. Okay. Does it refer to Florida?

2 MR. COLIN: Object to form.

3 A. I don't know what she means.

4 Q. (BY MR. KRASIK) Well, do you know Pam Burkett?

5 A. I do.

6 Q. Okay. Pam Burkett is the church treasurer?

7 A. Yes, I think so. That's what it says.

8 Q. Okay. From your knowing Pam Burkett, would she
9 say anything to the Court in connection with your
10 husband's sentencing that wasn't accurate?

11 MR. COLIN: Object to form.

12 A. I think she was trying to display that Jason
13 generously donated to the church.

14 Q. (BY MR. KRASIK) My question was, from your
15 familiarity and knowledge of Pam Burkett, would she say
16 something to the Court in connection with your husband's
17 sentencing that wasn't accurate?

18 MR. COLIN: Object to form.

19 A. I don't know.

20 Q. (BY MR. KRASIK) Do you think she would make
21 every effort to be accurate?

22 MR. COLIN: Object to form.

23 A. I don't know what other people think or say or
24 the meaning of their words.

25 Q. (BY MR. KRASIK) You think she might not have

Transcript of Angela Svonavec
Conducted on November 4, 2024

88

1 been?

2 MR. COLIN: Object to form.

3 Q. (BY MR. KRASIK) You think she might not have
4 been --

5 MR. COLIN: Object to form.

6 A. I don't know.

7 MR. COLIN: Object to form.

8 Q. (BY MR. KRASIK) Showing you what I've marked
9 Exhibit 14.

10 (Deposition Exhibit No. 14 marked)

11 Q. (BY MR. KRASIK) Ms. Svonavec, do you recognize
12 this as a civil complaint that you and your husband
13 filed against Ron McIntosh?

14 A. Yes, that's what it looks like.

15 Q. Okay.

16 MR. COLIN: For the -- for the record,
17 Mr. Krasik, there appears to be a fax stamp at the top
18 bearing the date 10-10-24. I assume we're not
19 characterizing that as the time that this was filed.

20 MR. KRASIK: No. No. No, no, no.

21 MR. COLIN: Okay. Just want to be clear
22 with that.

23 MR. KRASIK: No. Oh. I believe the filing
24 date is what's stamped June 24th, 2019. If you look on
25 the right -- upper right corner, but thank you for

Transcript of Angela Svonavec
Conducted on November 4, 2024

89

1 clarifying that.

2 Q. (BY MR. KRASIK) Ms. Svonavec, do you see the
3 date stamped?

4 A. Yeah.

5 Q. Actually, I -- we can be even more specific.
6 If you look underneath your names and Mr. McIntosh's
7 lane -- name --

8 A. Oh, yeah, June 18th --

9 Q. -- it says case filed June 18th, 2019?

10 A. Yes.

11 Q. Okay. So this civil complaint was filed
12 June 18th, 2019. Correct?

13 A. Yes.

14 Q. And the address listed for Jason and Angela
15 Svonavec on this complaint is 192 Stone Ridge Lane,
16 Rockwood. Correct?

17 A. Yes.

18 Q. And if I could direct your attention below the
19 handwritten narrative in the middle of the page, do you
20 see it says, I, Angela Svonavec, verify that the facts
21 set forth in this complaint are true and correct to the
22 best of my knowledge, information and belief. This
23 statement is made subject to the penalties of
24 Section 4904 of the Crimes Code related to unsworn
25 falsification to authorities. Do you see that?

Transcript of Angela Svonavec
Conducted on November 4, 2024

90

1 A. Yes.

2 Q. Did you understand that you were swearing or
3 verifying that the information on this civil complaint
4 was accurate?

5 MR. COLIN: Object to form.

6 A. Yes, and this was the address that this person
7 was paid for something and didn't supply it to, so the
8 address where he should have provided -- it says trees.
9 I knew it was landscaping, yeah. I vaguely remember
10 this case. But that was the location -- it's not
11 claiming my -- that I reside there. It's not claiming
12 anything other than that was the location where he was
13 being sued for not providing something.

14 Q. (BY MR. KRASIK) Ms. Svonavec, isn't it true
15 that you verified a civil complaint filed with a
16 Pennsylvania Court identifying your address as 192 Stone
17 Ridge Lane in Rockwood?

18 A. I was ver --

19 MR. COLIN: Object to form. You may
20 answer.

21 A. I was verifying the address where the complaint
22 was from. That was the intention there. I do think
23 that was truthful.

24 Q. (BY MR. KRASIK) The verification that you
25 made, if I could refer you to the middle of the page,

Transcript of Angela Svonavec
Conducted on November 4, 2024

91

1 says, the facts set forth in this complaint are true and
2 correct. Correct?

3 A. Yes. This is true and correct. What it says
4 in the paragraph is what was not provided to the -- to
5 the address at the Jason Svonavec, 192 Stone Ridge Lane
6 address.

7 Q. The paragraph doesn't say that, does it?

8 A. The paragraph says what happened. And this is
9 the location where it happened.

10 Q. Can we agree that what you verified here, you
11 said, I, Angela Svonavec, verify that the facts set
12 forth in this complaint are true and correct to the best
13 of my knowledge, information and belief?

14 A. Yes. And that's what I just clarified was the
15 facts and the knowledge.

16 Q. So you're saying that you limited what you were
17 verifying?

18 MR. COLIN: Object to form.

19 A. No, it's correct.

20 MR. COLIN: Object to form.

21 Q. (BY MR. KRASIK) The facts in the complaint?

22 A. The facts in the complaint, yes.

23 Q. Okay. All right. Could we refer back to -- I
24 think it's Number 3 was the compilation exhibit of tax
25 returns. All right. I want to kind of deal with these

Transcript of Angela Svonavec
Conducted on November 4, 2024

92

1 in groups, so we don't have to go through each one, if
2 we can do that. Earlier we were talking about 2012
3 and -- withdrawn.

4 This exhibit collects the -- the redacted
5 tax returns we were provided for the years 2012 through
6 2023. You're welcome to flip through that. And I
7 believe there's one -- one PA return for one year that
8 might not be there, but I can represent to you this is a
9 collection of everything that we got for this period.

10 MR. COLIN: And we'll stipulate to that.

11 MR. KRASIK: Yeah. Okay.

12 Q. (BY MR. KRASIK) Now, for this entire period,
13 for 2012 to 2023, you filed federal income tax returns
14 as married, filing jointly, with Jason. Is that
15 correct?

16 MR. COLIN: Object to form.

17 A. I -- again, I've never prepared my own taxes.
18 I don't know how they were filed. I signed them. So --

19 Q. (BY MR. KRASIK) Okay. Well, if you look
20 through these, the federal -- page 1 is the federal tax
21 return for 2012 and then a couple pages later for 2013
22 and then for 2014. All of those federal tax returns
23 list your name and Jason's name together with a
24 Pennsylvania address. Isn't that correct?

25 MR. COLIN: Object to form.

Transcript of Angela Svonavec
Conducted on November 4, 2024

93

1 A. Yes.

2 Q. (BY MR. KRASIK) Okay. And then my question
3 is, for the federal tax returns, were you filing them
4 married filed jointly with Jason in all of these years?

5 MR. COLIN: Object to form.

6 A. I don't know how they were prepared.

7 Q. (BY MR. KRASIK) Okay. And you don't know --
8 aside from how they were prepared, you don't have an
9 understanding about your status of filing your federal
10 returns for these years?

11 A. I don't have any understanding on taxes.

12 Q. Okay.

13 A. It's definitely something to direct to them --

14 Q. Okay.

15 A. -- the preparers.

16 Q. Okay. Earlier we were talking about that for
17 2012 and 2013 for your Pennsylvania returns, that you
18 filed Pennsylvania income tax returns married filed
19 jointly with Jason.

20 MR. COLIN: Object to form if that's a
21 question.

22 MR. KRASIK: Is that -- I was going to say,
23 is that right?

24 A. I don't know anything about the tax
25 preparation. I -- I'm looking at it for the first time

Transcript of Angela Svonavec
Conducted on November 4, 2024

94

1 with you. Whatever you see here obviously is going to
2 be how it was filed.

3 Q. (BY MR. KRASIK) Uh-huh.

4 A. And I don't have any further insight into how
5 it was filed.

6 Q. Okay. Let's try this. If you turn to the page
7 that's marked BANS01797. Do you see that page -- that
8 number at the bottom?

9 MR. COLIN: We didn't produce these to you
10 in this order, did we?

11 MR. KRASIK: They're out of order.

12 MR. COLIN: Okay.

13 MR. KRASIK: Because there were redacted
14 pages that followed each one. I just put together --

15 MR. COLIN: 1797?

16 MR. KRASIK: 1797.

17 MR. COLIN: All right. It would be the
18 fourth piece of paper in the packet.

19 A. Oh, there. Fourth.

20 Q. (BY MR. KRASIK) Okay. And if we look again on
21 the right column of information, one, two, three --
22 three down -- three lines down, you see a J?

23 A. Yes.

24 Q. Okay. And the options there, I think we went
25 through, there's an S for single, then married filed

Transcript of Angela Svonavec
Conducted on November 4, 2024

95

1 jointly is a J, married filed separately is an S, and --
2 I'm not sure what final return means, but there's a J
3 there which I think means filing jointly married. Do
4 you see that?

5 A. Yes.

6 Q. Okay. If you turn two pages back --

7 A. One, two.

8 MR. COLIN: Two pages toward the front?

9 MR. KRASIK: No, no. Toward --

10 MR. COLIN: Two pages later.

11 MR. KRASIK: Later.

12 Q. (BY MR. KRASIK) It's the 2014 Pennsylvania
13 return and again, three lines down, there's now an M as
14 in married, not a J. Do you see that?

15 A. Yes.

16 Q. Okay. And I believe if you look at the -- the
17 initials or the symbols, whatever you call it, married
18 filed jointly is a J, married filed separately is an M?

19 MR. COLIN: Object to form.

20 Q. (BY MR. KRASIK) Okay. So you're not familiar
21 with how -- the -- these -- whatever letter was chosen
22 for that --

23 A. I'm not familiar.

24 Q. Okay. But we can agree there's a difference
25 between 2013 and 2014?

Transcript of Angela Svonavec
Conducted on November 4, 2024

96

1 A. Correct.

2 Q. Okay.

3 A. Which makes sense. That's when I believe that
4 we moved.

5 Q. So right. So 2012 and '13 it says S, but then
6 it -- I'm sorry. It says -- yeah, it says J.

7 MR. COLIN: J.

8 Q. (BY MR. KRASIK) I'm sorry, J. And then in 2014
9 and I believe from then on, it says M. And feel free to
10 check me on the Pennsylvania returns after that.

11 A. Should be correct, because that's about the
12 timeframe I believe I moved here. 2014. But I'll take
13 your word for it. I don't need to go through them all.

14 Q. Okay.

15 MR. COLIN: Yeah, I mean, Mr. Krasik, for
16 the record, we will stipulate that they say what they
17 say.

18 A. Yeah.

19 Q. (BY MR. KRASIK) Okay. And where I wanted to
20 get, but it sounds like your knowledge might be limited
21 is, why did you file federal income tax returns as
22 married filed jointly, but Pennsylvania returns as
23 married filed separately?

24 MR. COLIN: Object to form.

25 A. And that definitely is a preparer question. I

Transcript of Angela Svonavec
Conducted on November 4, 2024

97

1 have no idea why they would choose any of those letters.

2 Q. (BY MR. KRASIK) Okay. Did you -- do you
3 recall any discussion with a tax preparer -- not
4 attorney -- tax preparer about how you were going --
5 about filing federal returns as married filed jointly,
6 but filing Pennsylvania returns as married filed
7 separately?

8 A. It was never discussed.

9 Q. It was never discussed? Or you don't recall --
10 how -- how would they know to do that?

11 MR. COLIN: Object to form.

12 A. I -- I don't know. I don't ever recall a
13 conversation of -- of choosing state and federal to be
14 different. Is that what you're saying, that they're
15 different?

16 Q. (BY MR. KRASIK) Uh-huh. Uh-huh.

17 A. Yes, I don't ever recall a discussion on that,
18 nor do I have any idea why they did that.

19 Q. You -- that was going to be my next question.
20 You don't know why?

21 A. I do not.

22 Q. Do you know who made the decision to file in
23 that way?

24 A. The preparer.

25 Q. And you don't recall any discussion with the

Transcript of Angela Svonavec
Conducted on November 4, 2024

98

1 preparer --

2 A. Correct.

3 Q. -- to that effect?

4 A. Correct.

5 Q. Okay. For the years that you filed state tax
6 returns through Pennsylvania as married filed
7 separately, so 2014 through the present, did you file a
8 state tax with the State of Florida?

9 A. I get all of my -- everything Docusign and so
10 I -- I don't know exactly every state that I'm signing
11 in, but I'm sure they're doing my Florida taxes.

12 Q. Well, Florida doesn't have an income tax.
13 Right?

14 A. Yeah.

15 Q. So you --

16 A. But there are taxes in Florida.

17 Q. Okay. What taxes are there in Florida?

18 A. I don't know, but they prepare them. There's
19 definitely property tax and isn't Sunbiz a tax? I'm not
20 sure. The accountants handle it all. Accountants and
21 attorneys.

22 Q. Okay. So -- but you're familiar that Florida
23 does not have an income tax?

24 A. It doesn't have income tax.

25 Q. Right. Okay. So for the same years we're

Transcript of Angela Svonavec
Conducted on November 4, 2024

99

1 talking about, 2014 through 2023, if you had filed --
2 withdrawn.

3 For the same years, 2014 through 2023, if
4 you had continued to file married filed jointly in PA,
5 you would have had to pay state income tax in
6 Pennsylvania. Right?

7 MR. COLIN: Object to form.

8 A. I don't know. I don't have that tax knowledge.

9 Q. (BY MR. KRASIK) Okay. Well, let me ask you
10 this. Does Jason pay state income tax to Pennsylvania?

11 MR. COLIN: Object to form.

12 A. I don't know. I -- it comes out of his pay.

13 Q. (BY MR. KRASIK) Uh-huh. So you're --

14 A. Actually it comes out of my pay.

15 Q. Do you pay state income tax to Pennsylvania?

16 A. I don't know. It's definitely a tax question.

17 Q. Okay. All right. So you don't know if you had
18 continued to file as married filed jointly for your PA
19 tax returns from 2014 to '23 whether you would have to
20 pay income tax in Pennsylvania?

21 A. I have no idea the rules of taxes. I just know
22 that the accountants and the lawyers are well aware
23 Jason is a Pennsylvania resident. I am a Florida
24 resident. And I assume they are doing everything
25 properly.

Transcript of Angela Svonavec
Conducted on November 4, 2024

100

1 Q. Okay. Have you referred to your Florida house
2 as your tax house -- tax home? Excuse me.

3 A. I'm homesteaded in Florida.

4 Q. But have you referred to your Florida house as
5 your tax home?

6 A. I don't know what that means.

7 Q. I don't know. Have you used that term?

8 A. I call it homesteaded.

9 Q. You don't recall using the term, it's your tax
10 home?

11 A. I don't understand the question. Like where I
12 pay tax -- I definitely pay my property taxes.

13 Q. I -- I don't --

14 MR. COLIN: Stop. Mr. Krasik is asking
15 you, have you ever characterized your house in Florida
16 as your tax home, I think is the question.

17 A. Not that I recall.

18 Q. (BY MR. KRASIK) Okay. Do you recall
19 characterizing your Florida house as your work home?

20 A. Characterizing it -- I do work from there.

21 Q. Have you used that expression before?

22 A. Working from home, yes, all the time.

23 Q. No. The term your work home. I don't know
24 if --

25 A. I don't recall.

Transcript of Angela Svonavec
Conducted on November 4, 2024

101

1 Q. Okay. That's fine. That's totally fair.

2 (Deposition Exhibit No. 15 marked)

3 Q. (BY MR. KRASIK) I'm going to show you what
4 I've marked as Exhibit 15. Your copies of 15 are double
5 sided because it's a longer document. Oh, sorry. I
6 will tell you that this document is an IR -- excerpts
7 from an IRS examiner's report --

8 A. Okay.

9 Q. -- that was produced by your lawyers to us.

10 A. Okay.

11 Q. And feel free to look through as much of the
12 document as you'd like, but I'm going to direct your
13 attention first to the number at the bottom that ends in
14 1703.

15 A. I'm having a hard time seeing those numbers.

16 Q. This one is on white so it should be --

17 A. Halfway back? Okay. Yes.

18 Q. You see that?

19 A. Yes.

20 Q. You're at that page. Okay. So in the middle
21 of the page, the document says, Fearless work paper
22 405-1.2 of the examiner's report states, quote, the
23 shareholder's wife is saying that Florida is her tax and
24 work home. Do you see that?

25 A. Yes.

Transcript of Angela Svonavec
Conducted on November 4, 2024

102

1 Q. Okay. I think you are the shareholder's wife
2 who's being referred to here. Does this refresh your
3 recollection that you've referred to your Florida house
4 as your tax home?

5 MR. COLIN: Object to form. You may
6 answer.

7 A. I -- I never spoke to an examiner ever. The
8 tax preparers did 100% of the communication with the
9 exam -- like, the IRS agent, I've never spoke to.

10 Q. (BY MR. KRASIK) Okay. So when this refers to
11 the examiner's report stating the shareholder's wife is
12 saying, you're saying you never spoke to that person?

13 A. Ever.

14 Q. Okay. And so seeing this does not refresh your
15 recollection that you've referred to your Florida home
16 as your tax home?

17 A. It does not.

18 Q. Okay. Could you turn back or up to -- up
19 earlier to -- and this one is a little harder to see.
20 This number is 1616 and it's printed half on the black
21 and half on the white, so it's a little hard to see.

22 A. Geez. Okay.

23 MR. COLIN: I'll help you when I find it
24 myself.

25 MR. KRASIK: It's under a heading that says

Transcript of Angela Svonavec
Conducted on November 4, 2024

103

1 Florida property. There isn't a lot here that's
2 unredacted, so if you just look for what's -- the words,
3 this is under the heading that says Florida property.

4 MR. COLIN: 1616, Mr. Krasik?

5 MR. KRASIK: Yes. If I'm reading this
6 right.

7 MR. COLIN: These seem to start on 1634 and
8 we end on 17 --

9 MR. KRASIK: Maybe it's 1646. I can't --
10 this is the page. I can't --

11 MR. COLIN: Got it. We got it.

12 MR. KRASIK: Okay. So I think it's --

13 THE WITNESS: Is it very close apart?

14 MR. COLIN: Here, I'll get you.

15 MR. KRASIK: For the record, I
16 misidentified it. I think it's the page that ends 1646.

17 A. Okay. I think I see it.

18 Q. (BY MR. KRASIK) All right. And under Florida
19 property, if I could direct your attention there,
20 Ms. Svonavec, it says the property is owned by Jason and
21 Angela Svonavec. The representatives contend it is an
22 office location for Fearless One, Inc. Do you see that?

23 A. Yes.

24 Q. Okay. I should have said this is a -- this is
25 a IRS examiner's report for the 2015 and 2016 tax years.

Transcript of Angela Svonavec
Conducted on November 4, 2024

104

1 A. Okay.

2 Q. So do you recall that you contended as part of
3 this process for 2015 and 2016 that your Florida home
4 was an office location for Fearless One, Inc.?

5 MR. COLIN: Object to form.

6 A. Again, my preparers would have represented all
7 of this. I never spoke to them, although I did work
8 full-time --

9 Q. (BY MR. KRASIK) Do you --

10 A. -- from the house.

11 Q. Sorry to interrupt. Do you contend that your
12 Florida home is an office location for Fearless One,
13 Inc.?

14 MR. COLIN: Today?

15 MR. KRASIK: Well, let's start with 1015,
16 2016.

17 A. I don't recall back that far.

18 Q. (BY MR. KRASIK) Do you contend that today?

19 A. I work from there for that company, but that's
20 a tax question. I don't know if it qualifies as an
21 office for that business specifically.

22 Q. What, again, did you say your relationship is
23 to Fearless One, Inc.?

24 A. I own it.

25 Q. You're the owner?

Transcript of Angela Svonavec
Conducted on November 4, 2024

105

1 A. Uh-huh.

2 Q. Do you know if -- do you contend today -- have
3 you contended at any time that your Florida home is an
4 office location of Fearless One, Inc.?

5 MR. COLIN: Object to form.

6 A. I don't know. I don't know what qualifies it
7 as that. If I -- if it was from working there, I don't
8 know. Like I say, that's a tax question for the
9 preparers.

10 Q. (BY MR. KRASIK) Okay. As the owner of the
11 company you don't know if your Florida home is an office
12 location of Fearless One, Inc.?

13 MR. COLIN: Object to form.

14 A. I don't know.

15 Q. (BY MR. KRASIK) Do you know why you would need
16 an office -- a Florida office for Fearless One, Inc.?

17 MR. COLIN: Object to form.

18 A. I need an office to work from and that's where
19 I live and work from.

20 Q. (BY MR. KRASIK) But why you would need an
21 office in Florida for Fearless One, Inc.?

22 MR. COLIN: Object to form.

23 Q. (BY MR. KRASIK) Do you know?

24 A. The same reason for any business. I need an
25 office to work from.

Transcript of Angela Svonavec
Conducted on November 4, 2024

106

1 Q. Do you recall you or those acting on your
2 behalf telling the tax examiner that the purpose -- that
3 the proper and substantial business purpose of the
4 Florida office is the state tax savings enabled thereby?

5 MR. COLIN: Object to form. I don't know
6 what they told her.

7 Q. (BY MR. KRASIK) You didn't authorize that
8 statement?

9 MR. COLIN: Object to form.

10 A. I didn't -- I authorized my tax preparers to
11 prepare my taxes and to handle the audit completely.

12 Q. (BY MR. KRASIK) Okay. Could you turn to page
13 1696, please.

14 A. Toward the end?

15 Q. Kind of in the middle.

16 A. Keep going? This? Okay.

17 Q. Okay. Before we get to page 1696, that's in
18 the middle of a letter. If you look at -- 1695 is the
19 first page of the letter. This is a letter to an
20 appeals officer for the Internal Revenue Service sent by
21 your attorneys at Metz Lewis Brodman Must O'Keefe?

22 A. Yes.

23 Q. You were using Metz Lewis in the process?

24 A. Yeah. We were -- yes.

25 Q. Okay. Now, if you look in -- at page 1696, the

Transcript of Angela Svonavec
Conducted on November 4, 2024

107

1 top paragraph on the page, do you see that your
2 attorneys wrote in the middle of that paragraph, among
3 other proper and substantial business purpose of the
4 Florida office is the tax -- state tax savings enabled
5 thereby? Do you see that?

6 A. What -- it says, as you know, taxpayers are
7 firmly convinced maintenance of an office in Florida is
8 ordinary.

9 Q. Read the next sentence.

10 A. The next sentence, among other property and
11 substantial business purpose of the Florida office is
12 the state tax savings enabled thereby.

13 Q. As the owner of Fearless One, Inc., did you
14 understand that a proper and substantial business
15 purpose of having a Florida office is the state tax
16 savings enabled thereby?

17 MR. COLIN: Object to form.

18 A. Well, I don't fully understand the questions,
19 and, no, I don't really understand that Florida was
20 needed for that company. Isn't -- that one is a
21 Delaware company. There is no tax there either. So
22 this is tax -- this is tax questions. I don't
23 understand.

24 Q. (BY MR. KRASIK) Okay. So as the owner of the
25 company you don't have an understanding whether a proper

Transcript of Angela Svonavec
Conducted on November 4, 2024

108

1 and substantial business purpose of the Florida office
2 is the state tax savings enabled thereby?

3 A. Right, I do not --

4 MR. COLIN: Object to form.

5 A. -- understand.

6 Q. (BY MR. KRASIK) You didn't understand that you
7 use the Florida house as a tax shelter?

8 MR. COLIN: Object to form.

9 A. I know they wrote off a portion of the house
10 for the business use, the office. I believe that they
11 did.

12 Q. (BY MR. KRASIK) Uh-huh. Isn't it true you
13 deducted all of the expenses of the Florida house on the
14 books of Fearless One?

15 A. Oh, I don't --

16 MR. COLIN: Object to form.

17 A. -- that the -- I don't know that.

18 Q. (BY MR. KRASIK) As the owner of the company
19 you don't recall that you wrote off all the expenses of
20 the house on the books of Fearless One to offset the
21 income that was generated from selling a plane in 2015?

22 MR. COLIN: Object to form.

23 A. I don't know.

24 Q. (BY MR. KRASIK) You don't know that?

25 A. I didn't -- I don't do the books.

Transcript of Angela Svonavec
Conducted on November 4, 2024

109

1 Q. Well, you're the owner of the company. Right?

2 MR. COLIN: Object to form.

3 A. I was not the owner then.

4 Q. (BY MR. KRASIK) You weren't the owner of
5 Fearless One in 2015?

6 A. Correct.

7 Q. Who was?

8 A. You'd have to go back and look. I -- probably
9 Jason, but it wasn't me.

10 Q. When did you become the owner of Fearless One,
11 Inc.?

12 A. I don't know. You'd have -- that's a Gabby
13 question.

14 Q. Okay. So you don't have an understanding that
15 you wrote off the expenses of the house -- you took the
16 expenses of the house as a deduction on Fearless One,
17 Inc.'s books to offset income generated from the sale of
18 a plane?

19 MR. COLIN: Object to form.

20 A. I don't know that at all. No, I have no
21 information on that or knowledge.

22 Q. (BY MR. KRASIK) Okay. Could you turn back now
23 toward the end to page 1762? That should be toward --
24 that's right at the end and it should be pretty easy to
25 see.

Transcript of Angela Svonavec
Conducted on November 4, 2024

110

1 A. Okay. Oh.

2 Q. Are you there?

3 A. Yes.

4 Q. Okay. And it says on the part that's not
5 redacted on page 1762, Mr. and Mrs. Svonavec have a
6 second home in Florida. In 2015 all the expenses were
7 paid by the taxpayer, but deducted on the books of
8 Fearless One, Inc., to offset income generated from the
9 sale of that entity's airplane. Do you see that?

10 A. I see that.

11 Q. Does that refresh your recollection that in
12 2015 the expenses for the house were deducted on the
13 books of Fearless One, Inc., to offset income generated
14 from the sale of the -- an airplane?

15 MR. COLIN: Object to form.

16 A. It doesn't refresh my memory, because I wasn't
17 involved in the preparation of it at all.

18 Q. (BY MR. KRASIK) You're saying you didn't know
19 this had occurred?

20 A. Correct.

21 Q. Does it surprise you?

22 MR. COLIN: Object to form.

23 A. I only see one sentence there. I'd have to
24 have a lot more information to know the context.

25 Q. (BY MR. KRASIK) We only see one sentence too.

Transcript of Angela Svonavec
Conducted on November 4, 2024

111

1 We'd like a lot more context also. We'll try to both
2 get more context and then we can have another discussion
3 about this.

4 A. I don't know that you really think that's
5 necessary. I'm pretty certain --

6 Q. I do.

7 A. -- you know I live here. I do have two homes
8 here.

9 Q. You have two homes where?

10 A. Here.

11 Q. In Florida?

12 A. (Moving head up and down).

13 Q. I thought I asked you earlier if there was any
14 other property in Florida.

15 A. You asked me in Pennsylvania.

16 Q. What other property do you own in Florida?

17 A. Saona.

18 Q. What is that?

19 A. Saona. 7209 Saona.

20 Q. 7209 Saona?

21 A. Uh-huh.

22 Q. And what city is that or what area?

23 A. Naples.

24 Q. Naples? And what type of property is at 7209
25 Saona?

Transcript of Angela Svonavec
Conducted on November 4, 2024

112

1 A. It's a home.

2 Q. Who -- who lives at 7209 Saona?

3 A. Nobody lives there. It's a rental. It's one
4 of the businesses I manage here.

5 Q. Okay. Thank you.

6 In 2015, Ms. Svonavec, isn't it true that
7 you caused Fearless One, Inc., to pay rent to you in the
8 amount of \$2,000 a month?

9 A. In what year?

10 Q. 2015.

11 A. Yeah, I don't know, but also all the rent is
12 determined by the accountants and lawyers.

13 Q. Could you turn to -- we were on this page
14 before. 1646, please.

15 A. Would that be in the front?

16 MR. COLIN: It's more up in the front.

17 THE WITNESS: That one?

18 MR. COLIN: Uh-huh.

19 Q. (BY MR. KRASIK) Okay. This is the paragraph
20 under Florida Property and in the second sentence it
21 says, they, meaning Jason and Angela Svonavec, also
22 contend that Fearless One and Banshee Crane are
23 registered to do business in Florida. There was a lease
24 agreement between the Svonavecs and Fearless paying rent
25 of \$2,000 a month. Do you see that?

Transcript of Angela Svonavec
Conducted on November 4, 2024

113

1 A. The -- management agreement? Is that the same
2 place?

3 Q. It goes on to say that, but I just want to talk
4 about --

5 A. Oh.

6 Q. -- the lease agreement first.

7 A. Yes.

8 Q. Okay. So does this refresh your recollection
9 that Fearless One was paying rent to you for your office
10 in Florida in the amount of \$2,000 a month?

11 A. No, again, anything with leases, rents
12 agreements, the attorneys and the accountant handled
13 entirely.

14 Q. Who made that decision?

15 A. The accountants and the attorneys.

16 Q. Who are they? Give me some names.

17 A. I don't know what year that --

18 Q. 2015.

19 A. I don't know who did it in 2015. We'd have to
20 look up the tax preparer. You have it somewhere on all
21 of these. So does it say that?

22 Q. I don't know if we have that page.

23 A. Yeah, I don't, just on recall, know.

24 Q. Okay. Your testimony under oath is that your
25 accountants made the decision to pay you \$2,000 a month

Transcript of Angela Svonavec
Conducted on November 4, 2024

114

1 in rent?

2 MR. COLIN: Object to form.

3 A. Yes, I did not. That was all through the
4 accountants and attorneys.

5 Q. (BY MR. KRASIK) Who were the attorneys? I
6 just want names. I'm not asking for communications.

7 A. I -- I don't know in 2015.

8 Q. One name?

9 A. I don't know in 2015. I -- I don't want to
10 give you a wrong name.

11 Q. Okay. Your testimony under oath is that
12 Fearless One paid rent of \$2,000 a month to you and your
13 husband, but you don't know who made that decision?

14 MR. COLIN: Object to form. Does this have
15 something to do with her -- the issue at bar?

16 MR. KRASIK: Absolutely.

17 MR. COLIN: Can you explain to me --

18 MR. KRASIK: No, I'm not going to. I will
19 at the end.

20 A. I was advised by my attorneys and lawyers -- or
21 my attorneys and accountants. I -- everything was under
22 advisement by them. I don't make decisions like this.
23 And in addition to that, I didn't own that company at
24 that time. But they had advised that and I would have
25 followed through with whatever was advised.

Transcript of Angela Svonavec
Conducted on November 4, 2024

115

1 Q. (BY MR. KRASIK) Okay. Did you own Fearless
2 One, Inc., in part, in 2015?

3 A. No. I think that's why there was a management
4 agreement.

5 Q. So you -- what role did you have with Fearless
6 One, Inc., in 2015?

7 A. I don't recall what it was in 2015, but I was
8 obviously fulfilling some role --

9 Q. I'm asking --

10 A. -- that this was necessary and I -- I don't
11 know. I don't recall back that far.

12 Q. Okay. So you had -- you needed to have an
13 office in Florida for Fearless One, Inc., for you, but
14 you don't know what role you were fulfilling at the
15 time?

16 A. Correct.

17 Q. Okay. All right. By paying you \$2,000 a month
18 in rent, that's \$24,000 a year of rent paid from
19 Fearless One, Inc., to you and your husband. Did you
20 pay state income tax on that income?

21 A. That's a tax question. I do not know.

22 Q. You don't know one way or the other?

23 A. No, I do not.

24 Q. Okay. If you had been a resident of
25 Pennsylvania and you received that income, would you

Transcript of Angela Svonavec
Conducted on November 4, 2024

116

1 have had to pay state tax on it?

2 MR. COLIN: Object to form.

3 A. I don't know.

4 Q. (BY MR. KRASIK) You don't know?

5 A. I don't know.

6 Q. Okay. And you don't know that since you're a
7 resident of Florida and there's no state income that you
8 didn't pay income tax on that?

9 MR. COLIN: Object to form.

10 A. I -- I don't know. I know that that is the
11 Delaware company.

12 Q. (BY MR. KRASIK) That wasn't my question.

13 A. That's where I'm confused. I do not know
14 anything about the taxes. You can ask me a hundred
15 different ways.

16 Q. Okay.

17 A. And I let somebody else prepare it --

18 Q. Okay.

19 A. -- and I trust that it's done properly.

20 Q. Okay. Okay. Well, I'm going to ask the
21 question. If you don't know the answer, then just say
22 you don't know.

23 A. Okay.

24 Q. All right. And do you know if Fearless One,
25 Inc., deducted that expense for rent on its books?

Transcript of Angela Svonavec
Conducted on November 4, 2024

117

1 A. I do not know.

2 MR. COLIN: Object to form.

3 Q. (BY MR. KRASIK) Okay. All right. Now,
4 separate from the -- the rent we just were talking
5 about, isn't it true that you caused Fearless One, Inc.,
6 to pay you a management service fee?

7 A. I don't know.

8 Q. Okay. Well, let's look back at this page.

9 A. It says it on there, but I don't know and I
10 don't recall anything about it.

11 Q. Okay. It says on there -- if you can turn to
12 1646.

13 A. I -- I did read it.

14 Q. Just so we're -- --

15 A. And on everything -- I'll agree that whatever
16 it says in there is how it was written by the tax
17 preparers, but I recall nothing about it.

18 Q. Okay. And just for the record, it says on page
19 1646, there was a management services agreement between
20 Fearless One and Heritage Coal that Mrs. Svonavec was
21 compensated to manage the business of Fearless. Right?

22 A. Heritage Coal. Yes.

23 Q. Well, you were compensated to manage the
24 business of Fearless. Right?

25 MR. COLIN: Object to form.

Transcript of Angela Svonavec
Conducted on November 4, 2024

118

1 A. That's what -- that's what it says. I don't
2 recall.

3 Q. (BY MR. KRASIK) Did you manage the business of
4 Fearless?

5 A. I don't recall.

6 Q. Okay. Do you recall receiving a management
7 service fee?

8 A. I don't recall.

9 Q. Do you know how much of a management service
10 fee you were paid?

11 MR. COLIN: Object to form. She just said
12 she didn't recall receiving one.

13 Q. (BY MR. KRASIK) Do you know for what years you
14 were paid a management service fee?

15 A. I do not.

16 Q. Okay. Isn't it true you did not pay state
17 income tax on this income?

18 MR. COLIN: Object to form.

19 A. I don't know that.

20 Q. (BY MR. KRASIK) You don't know one way or the
21 other?

22 A. I do not know.

23 Q. Do you -- would you have paid state income
24 tax -- well, Florida has no state income tax. Right?

25 A. Florida has none and Delaware has none --

Transcript of Angela Svonavec
Conducted on November 4, 2024

119

1 Q. Okay.

2 A. -- and Montana.

3 Q. So if you're receiving this money in Florida,
4 do you think you paid income tax on it in Florida?

5 A. I don't know.

6 Q. Do you think you paid income tax on it in
7 Pennsylvania?

8 A. I don't know.

9 Q. If you were a Pennsylvania resident you know --
10 would you have had to pay income tax on this money?

11 MR. COLIN: Object to form.

12 A. I don't know. That's a tax question.

13 Q. (BY MR. KRASIK) Okay.

14 A. And tax law changes every year, so 2015, I have
15 no idea.

16 Q. Okay.

17 A. I don't even know this year's tax code.

18 Q. I'm asking you facts of what happened. I'm not
19 asking you to understand the tax code.

20 A. And I don't know.

21 Q. Okay. And do you know if Fearless One deducted
22 the management fee paid to you as an expense on its
23 books?

24 A. I have no idea.

25 MR. COLIN: Object to form.

Transcript of Angela Svonavec
Conducted on November 4, 2024

120

1 A. No idea what deductions were taken.

2 Q. (BY MR. KRASIK) All right. Do you recall that
3 you also caused Banshee to pay rent to you?

4 A. I do not know.

5 Q. You don't know?

6 A. No.

7 Q. Okay. Can you turn back to page 1696, please.

8 That's the one not towards the -- towards the end.

9 That's part of the Metz letter that we were looking at
10 before.

11 A. 1696. Yep. Oops.

12 Q. Are you there? Okay. In the middle of the
13 page, do you see under the heading, Return?

14 A. Yes.

15 Q. And these are expenses that you claimed on your
16 return. You can feel free to read as much of this
17 letter as you want, but these are a list of returns that
18 you claimed that are being disputed.

19 MR. COLIN: Object to form.

20 Q. (BY MR. KRASIK) Do you understand that these
21 are --

22 A. Yeah, that -- yes.

23 Q. Okay. And one of the expenses claimed on the
24 return is Banshee rent?

25 A. Yes.

Transcript of Angela Svonavec
Conducted on November 4, 2024

121

1 Q. Okay. And in 2015, the amount of the Banshee
2 rent was \$111,216?

3 A. That's what it says.

4 Q. Okay. Does that refresh your recollection that
5 Banshee was paying you rent in the amount of \$111,216 in
6 2015?

7 A. No, it does not.

8 Q. Okay. Do you know if you paid state income tax
9 on this income?

10 A. I have no idea how the taxes were filed.

11 Q. Okay. And do you have an understanding if you
12 would have been required to pay state tax in
13 Pennsylvania on this income had you been a resident
14 there?

15 A. I do not have any knowledge on the tax laws.

16 Q. And do you know if Fearless One, Inc., deducted
17 this so-called expense on its books?

18 A. I do not know.

19 MR. COLIN: Object to form.

20 A. I have no idea.

21 Q. (BY MR. KRASIK) Okay. If this money was paid
22 to you, the Banshee rent, the management service fee and
23 the -- and the Fearless rent was paid to you, wouldn't
24 that be a way to get you income without paying state tax
25 on it?

Transcript of Angela Svonavec
Conducted on November 4, 2024

122

1 MR. COLIN: Object to form.

2 A. I have no idea.

3 Q. (BY MR. KRASIK) Okay. And in addition to
4 giving you income without paying tax on it, it would
5 have been a deduction for Fearless One, Inc.?

6 MR. COLIN: Object to form.

7 Q. (BY MR. KRASIK) Is that right?

8 MR. COLIN: Object to form.

9 A. I don't know. I don't understand what's
10 deductible.

11 Q. (BY MR. KRASIK) Okay. Do you have an
12 understanding -- for the years that you've claimed to be
13 a Florida resident, 2014 through 2023, do you have an
14 understanding in what state income attributable -- I'm
15 sorry. Withdrawn.

16 For the years you've claimed to be a
17 Florida resident, 2014 to 2023, for income you earned
18 from Heritage Holding Company, in what states that
19 income was attributed?

20 MR. COLIN: Object to form.

21 A. I don't understand, no.

22 Q. (BY MR. KRASIK) No? For income -- for the
23 period 2014 through 2023 for income you received from
24 Banshee, do you know in what states that income was
25 allocated?

Transcript of Angela Svonavec
Conducted on November 4, 2024

123

1 MR. COLIN: Object to form.

2 A. I do not.

3 Q. (BY MR. KRASIK) Same question for Fearless
4 Leasing, LLC.

5 MR. COLIN: Object to form.

6 A. Same answer. I have no idea on any tax
7 decisions.

8 Q. (BY MR. KRASIK) Get the list here. Okay.
9 Other than Heritage Holding Company, Banshee Industries,
10 LLC, Fearless One, Inc., and Fearless Leasing, LLC, do
11 you own any other companies currently?

12 A. Yes.

13 Q. Okay. Which other companies?

14 A. I would need a whiteboard to look them up. I
15 don't know. I have -- I don't -- I can't recall them
16 all.

17 Q. Okay.

18 A. I think there are roughly a dozen.

19 Q. Okay. But as you sit here today you can't
20 recall the names?

21 A. Specific to this year or specific to always?

22 Q. I'm asking currently, do you own any other
23 companies?

24 A. Yes, I do.

25 Q. What is another one?

Transcript of Angela Svonavec
Conducted on November 4, 2024

124

1 A. I actually had -- Gabby, my attorney, has just
2 reorganized everything, so I am not 100% sure, so I
3 don't want to answer wrong.

4 Q. Okay.

5 A. So in the last six or eight months we have done
6 a lot of reorganization in forming of corporations and I
7 don't know --

8 Q. Okay.

9 A. -- with 100% accuracy.

10 (Deposition Exhibit No. 16 marked)

11 Q. (BY MR. KRASIK) Showing you what I've marked
12 as Exhibit 16.

13 THE WITNESS: Can we soon take a rest room
14 break?

15 MR. KRASIK: Whenever you want.

16 THE WITNESS: You want to do that first?

17 MR. COLIN: Sure.

18 THE VIDEOGRAPHER: We are going off the
19 record. The time is 12:01 p.m.

20 (Recess from 12:01 p.m. to 12:31 p.m.)

21 THE VIDEOGRAPHER: We are back on the
22 record. The time is 12:31 p.m.

23 Q. (BY MR. KRASIK) Ms. Svonavec, earlier we were
24 talking about Fearless Leasing, LLC, operating the --
25 your company's plane. Is that right?

Transcript of Angela Svonavec
Conducted on November 4, 2024

125

1 A. That's Fearless One.

2 Q. I'm sorry. Fear --

3 A. It is confusing. There's three Fearlesses. So
4 there's Fearless One, then Fearless Leasing, which is
5 the equipment, and then Fearless 2.

6 Q. Okay.

7 A. So we call them F1, F2 and Fearless.

8 Q. Okay. Fearless One, Inc., operates the plane?

9 A. F1, yes.

10 Q. Okay. What does F2 do, by the way?

11 A. Charters down here in Florida.

12 Q. Charters. Okay.

13 A. Of yacht charters.

14 Q. Okay. Thank you. And we say it operates the
15 plane. Does Fearless One, Inc., own the plane?

16 A. I'm not sure.

17 Q. Okay.

18 A. I believe -- I believe, but I'm not sure.

19 Q. Okay.

20 A. That's a attorney question.

21 Q. Okay. And -- and that -- and you have access
22 to the plane. Right?

23 A. Right. So -- yes.

24 Q. Okay. Is that the principal way that you
25 travel between Pennsylvania and Florida?

Transcript of Angela Svonavec
Conducted on November 4, 2024

126

1 A. Yes. Me, yes.

2 Q. Okay. I just want to focus on 2024, current
3 year.

4 A. Okay.

5 Q. Did you travel between Florida and Pennsylvania
6 any way other than the plane that Fearless One, Inc.,
7 owns?

8 A. No.

9 Q. That was the only way?

10 A. Yes.

11 Q. You didn't drive one time?

12 A. I don't believe.

13 Q. Okay.

14 A. Oh, but I've used other people's planes --

15 Q. Okay.

16 A. -- to get here, so I have been here --

17 Q. And again, just -- just focusing on 2024.

18 A. Yeah. This year I've used other people's
19 planes. We had our plane down some time.

20 Q. Okay. So who -- whose plane and when in 2024?

21 A. Oh, boy. I don't know the exact dates. One
22 was to get me to an auction and one of my business
23 associates out of Texas was here and sent his plane down
24 for me. I've been on with Mack Trailers. I -- I can't
25 remember them all, to be honest with you. It's -- every

Transcript of Angela Svonavec
Conducted on November 4, 2024

127

1 week is a blur to me.

2 Q. Okay. So then when you went on a plane from a
3 business associate from Texas, do you remember what time
4 of year it was?

5 A. It was during the auctions because I was going
6 to an equipment auction in -- in North Florida. In
7 Kissimmee.

8 Q. And let me ask this question. Was that a
9 flight from Naples to Kissimmee?

10 A. Yeah. Naples, yeah.

11 Q. Okay.

12 A. Picked me up here and took me to Orlando.

13 Q. Just focusing on going from Pennsylvania to
14 Florida --

15 A. Oh. Yeah, I wasn't up very many times this
16 year, so I -- I can't tell you whose plane I was on when
17 I went, but I'd have to look at the dates. I'd have to
18 look at a calendar.

19 Q. In 2024 did you travel between Pennsylvania and
20 Florida any way other than your plane?

21 A. I don't know. That's what I'm saying. I'd
22 have to look at a calendar and I don't even know if I'd
23 know that.

24 Q. Okay. I'm just -- and just focused on 2024.

25 A. Right. I don't know.

Transcript of Angela Svonavec
Conducted on November 4, 2024

128

1 Q. Okay.

2 A. I don't know.

3 Q. Did you ever drive?

4 A. I don't know. I don't want to say that I
5 didn't, because I'm just not sure. I don't know.

6 Q. Did you ever fly commercial?

7 A. I have flown commercial.

8 Q. In 2024?

9 A. I don't know. I don't know.

10 Q. Okay. I'm showing you what I've marked as
11 Exhibit 16.

12 A. Oh, boy. My eyes can't see that well, I'm
13 sorry.

14 Q. Unfortunately, this is how it was produced, so
15 we'll all strain our eyes on it. This is an excerpt of
16 a document that was produced to us in this litigation.
17 Have you -- do you know what this type of document is?

18 A. No, I've never seen this.

19 Q. You didn't provide this to your attorneys?

20 A. No.

21 Q. Okay. You don't know what an aviation -- on
22 the left upper left side of the header, it says ATC. Do
23 you see that?

24 A. Right. I don't know what it is.

25 Q. Aviation -- Aviation Tax Consultants, LLC?

Transcript of Angela Svonavec
Conducted on November 4, 2024

129

1 A. I don't know. I don't deal with them or record
2 any of this data.

3 Q. Okay. Well, what this appears to be is
4 tracking your flights using the plane owned by Fearless
5 One, Inc. -- Fearless One, LLC, in 2024. Okay? So I
6 want to go through these -- well, let me ask you this.
7 This is how this doc -- these two pages of the document
8 were produced to us with all -- with certain information
9 exposed and a lot redacted. Do you know why the
10 information that is redacted was redacted?

11 A. No, I've never seen this report. And I
12 actually can't even read it.

13 Q. Well, I'll help you.

14 A. Okay.

15 Q. If we look at the first -- the -- the last line
16 of what is exposed on page 1, it lists a date 3-31-2024,
17 Naples, Florida, to Friedens, PA. Is there a private
18 airport in Friedens?

19 A. Uh-huh.

20 Q. Okay. So you flew from -- on 3-31 from Naples,
21 Florida, to Friedens, PA. Does that mean -- and the
22 prior listing that we're able to see is from December --
23 excuse me -- February in-Florida flights. So this is
24 the first flight that we see that takes you to
25 Pennsylvania. Does this mean that prior to 3-31-2024

Transcript of Angela Svonavec
Conducted on November 4, 2024

130

1 you were in Florida?

2 A. Yes, I was in Florida -- we left -- almost
3 all -- every year we leave the 25th of December and then
4 I stay here and everybody else comes back and forth. So
5 this would be other people coming to me.

6 Q. Now, this --

7 A. Or going back --

8 Q. This is a flight from Naples to Friedens --

9 A. Yeah.

10 Q. -- on 3-31.

11 A. So maybe Jason came and then went back, but how
12 did the plane get here from Friedens? This --

13 Q. You didn't come to Pittsburgh from Florida on
14 3-31-2024?

15 A. No.

16 Q. No?

17 A. No. I -- I don't know how to read this, but I
18 can tell from looking at it that it's not even accurate,
19 because the plane does not -- the plane doesn't stay in
20 Florida. So it had to come from somewhere to Naples to
21 get whoever was here and took somebody back to Friedens.
22 Likely not me, because -- and if it was, I was there a
23 day or two and straight back, but I didn't leave. This
24 year I didn't leave until May -- till right at Mother's
25 Day or even maybe right after Mother's Day.

Transcript of Angela Svonavec
Conducted on November 4, 2024

131

1 Q. Your testimony is you didn't come to
2 Pennsylvania from Florida until Mother's Day of 2024?

3 A. Yeah, it was May or June this year, yes.

4 Q. You were in Florida from January till May or
5 June 2024?

6 A. From December 25th. From Christmas Day of 2023
7 solid -- I don't recall going back for anything unless
8 somebody died, I went for a day or two and came back.

9 Q. Okay. Well, I can only --

10 A. But I don't recall it.

11 Q. I'm only looking at the information that your
12 attorneys provided. There's a flight on 3-31-2024 from
13 Naples to Friedens. Your testimony is you weren't on
14 that flight?

15 A. Not that I'm aware. I gave my travel log. I
16 have a travel log. This isn't it. I've never seen this
17 ever. So my travel log was very, very accurate. And
18 all of my receipts 100% back up my travel log.

19 MR. KRASIK: I don't know what that means,
20 but obviously we --

21 MR. COLIN: I don't -- I don't know what
22 that means either. We'll have to look and -- this is
23 not the travel log?

24 THE WITNESS: This is not the travel log.
25 I have never seen this in my life. I don't know what

Transcript of Angela Svonavec
Conducted on November 4, 2024

132

1 the ATC even means.

2 MR. COLIN: We'll have to look --

3 MR. KRASIK: Did you intend that these
4 flights were the flights that Ms. Svonavec took?

5 MR. COLIN: My understanding of the
6 redactions of this document is that every flight on here
7 that is memorialized that does not bear Angie Svonavec
8 has been redacted.

9 MR. KRASIK: That's what I would have
10 assumed.

11 MR. COLIN: That's my understanding. So
12 she's saying -- obviously right now she's saying that
13 this is not accurate because she does not remember -- I
14 will say, she does not remember taking a flight on her
15 plane on 3-31-24 from Naples to Friedens.

16 MR. KRASIK: Right.

17 THE WITNESS: Right.

18 MR. COLIN: If she doesn't remember that,
19 she doesn't remember that.

20 A. But here's what I'll say. From December till
21 when the plane came down in -- to Naples on whatever
22 date that is, it looks like February, then we went up to
23 an auction, so that -- that was one of the auctions I'd
24 have been on my plane, but there were others I went from
25 Naples up to others. But I've been in Florida the whole

Transcript of Angela Svonavec
Conducted on November 4, 2024

133

1 time clear through till this summer.

2 Q. (BY MR. KRASIK) Okay.

3 A. And then traveled various other places. I do
4 have a very thorough log. I don't know where you got
5 this or what this is -- because this is very -- and then
6 I don't think I was on that flight, but if it was it
7 would be on my actual log and it wouldn't have been for
8 many days.

9 Q. Okay. Let me try to help you, Ms. Svonavec.

10 A. And then it's June.

11 Q. And if you look over across that line there's a
12 column that says passenger names.

13 A. Yeah.

14 Q. So I think what your counsel is saying is that
15 all -- all flights for which you were not the passenger
16 have been redacted, so if there's a flight listed, that
17 means you were the passenger. And in fact, for the
18 flight on 3-31-2024 it lists a passenger name, Angela
19 Svonavec. Do you see that?

20 A. I see that.

21 Q. Okay.

22 A. And whether that's correct or not, I can't tell
23 you. It could be an error. Likely is an error.

24 Q. Why is it likely an error?

25 A. Because I have -- I was in Florida, like I just

Transcript of Angela Svonavec
Conducted on November 4, 2024

134

1 told you, from Christmas till -- I don't remember going
2 back to PA at all. And like I say, if I did it was --
3 it was -- like if there's a funeral sometimes I'll go
4 back, but then I'm -- I am right back here. So it
5 doesn't make sense.

6 Q. Why doesn't it make sense, Ms. Svonavec?

7 A. Well, then how did I get back?

8 Q. Okay. Well, let's look at the next line. The
9 next flight that you're on is listed on June 30th, 2024,
10 from Friedens to Naples.

11 A. Right. So that's impossible, because it's very
12 well documented on here all those other months.

13 Q. Why is it well documented? Where is it well
14 documented?

15 A. You've seen all of my receipts and all of my
16 appointments and all of my -- there's -- there's so much
17 evidence. I have -- this is -- this is an error. This
18 is wrong.

19 Q. You're saying this document is in error?

20 A. This -- first of all, I've never seen this
21 document. I don't know who prepared it. I don't know
22 where they got the names that are here, because I can
23 tell you my pilots don't take an inventory. Nobody
24 signs anything when they're on the plane. And I -- I
25 have never seen it.

Transcript of Angela Svonavec
Conducted on November 4, 2024

135

1 Q. Do you know if you have to track your flights
2 for tax purposes?

3 A. I don't know that.

4 Q. Since this document is called Aviation Tax
5 Consultants, LLC, I thought this might be used for tax
6 preparation purposes.

7 A. I don't know.

8 Q. You don't know?

9 A. I don't know.

10 Q. Okay. So how do you know if this is accurate
11 or not?

12 A. Because I know where I was.

13 Q. Well, we can only go by the information that
14 was provided to us.

15 A. Well, this is one page out of thousands of
16 pages that you were provided.

17 Q. Okay. So how -- if your testimony is that
18 you -- do you dispute that you came to Pennsylvania from
19 Florida on 3-31-2024?

20 A. I have no idea.

21 Q. Okay.

22 A. I'm saying that my thousands of pages --

23 MR. COLIN: That's not what Mr. Krasik is
24 asking you, if I could --

25 A. I don't know. I -- I have never seen this --

Transcript of Angela Svonavec
Conducted on November 4, 2024

136

1 nobody has ever asked me about this and I have never
2 signed anything when I got on the plane, when I got off
3 the plane.

4 Q. (BY MR. KRASIK) Okay.

5 A. It doesn't look accurate to me because I know
6 my general whereabouts and which months and that's not
7 accurate of a depiction whatsoever.

8 Q. Okay. Do you have any basis for saying that?

9 A. Knowing where I'm at?

10 Q. No. Saying that this document is inaccurate.

11 A. Because it contradicts all of my receipts and
12 my -- all my other details.

13 Q. Okay. Well, if we were to assume this document
14 is accurate, which I have to believe it is because it
15 was produced to us by -- in this litigation by your
16 counsel.

17 MR. COLIN: Well, let's --

18 Q. (BY MR. KRASIK) This shows --

19 MR. COLIN: -- take a step back from that.
20 I mean, we produced what we had. Okay. So obviously,
21 you know, I don't control Aviation Tax Consultants and
22 their recordkeeping practices, but this is what we
23 were -- this is what we have vis-a-vis the plane and its
24 occupants. Now, if Ms. Svonavec is saying that this is
25 incorrect, then I -- this is what it is. I mean, she's

Transcript of Angela Svonavec
Conducted on November 4, 2024

137

1 saying that it's not correct. This is the paperwork
2 that we have.

3 MR. KRASIK: Okay.

4 MR. COLIN: I'm not aware of any other
5 paperwork.

6 THE WITNESS: And 2024 hasn't been
7 completed yet. Like, maybe it hasn't been updated or
8 maybe it -- it's not a --

9 MR. COLIN: All right. There's no question
10 pending for you. I'm having a -- I'm trying to sort
11 this out with Mr. Krasik.

12 MR. KRASIK: We intend to rely on this
13 document, so if there's some other evidence that you
14 intend to rely on after we file our opposition to motion
15 to remand relying on this document, we need that
16 produced.

17 MR. COLIN: Understood. And -- and that is
18 understood within the context of her oral testimony here
19 today in which she's saying this is not correct.

20 THE WITNESS: It's not correct.

21 MR. COLIN: Okay. Then let me -- let me
22 talk with Mr. Krasik, please. Okay? So if there are
23 documents that are discoverable and not privileged that
24 shed additional light on this issue, we'll be happy to
25 produce them.

Transcript of Angela Svonavec
Conducted on November 4, 2024

138

1 MR. KRASIK: Okay.

2 MR. COLIN: If it turns out to be that her
3 testimony is the evidence of the inaccuracy of this,
4 then so be it.

5 MR. KRASIK: Okay.

6 Q. (BY MR. KRASIK) And your testimony,
7 Ms. Svonavec, is that this document that was produced to
8 us is not accurate?

9 A. It's 100% not accurate.

10 Q. Okay.

11 A. I was not in Friedens from March till June.

12 Q. June? Okay.

13 A. 100% inaccurate. I was here.

14 Q. Do you have any basis for saying that?

15 A. Because I was here.

16 Q. Do you have any basis for saying that?

17 A. I have proof that I was here.

18 Q. Okay.

19 MR. KRASIK: We would request whatever
20 proof Mrs. Svonavec is referring to --

21 THE WITNESS: So I've produced thousands of
22 pages of --

23 THE REPORTER: Hold on. Y'all are talking
24 over each other.

25 MR. KRASIK: We would request whatever

Transcript of Angela Svonavec
Conducted on November 4, 2024

139

1 proof Ms. Svonavec is referring to.

2 MR. COLIN: Understood.

3 Q. (BY MR. KRASIK) Okay. Ms. Svonavec, just
4 relying on this document that we have, this shows you
5 came to Pennsylvania on 3-31-2024 and returned to
6 Florida on 6-30-2024. Isn't that right?

7 A. It's incorrect.

8 Q. But that's what the document shows?

9 MR. COLIN: Okay. I'll --

10 THE WITNESS: I heavily --

11 MR. COLIN: Stop, stop, stop, stop, stop.

12 Objection to form because she didn't write this and
13 she's disputed its accuracy. You may answer.

14 So the question is, does this document,
15 which you didn't write, show that you left Naples and
16 went to Friedens on 3-31-24 and you did not return from
17 Friedens to Naples until 6-30-24.

18 A. That's what this flight record that somebody
19 prepared somewhere that I've never seen before would
20 show.

21 MR. COLIN: Okay. You're saying it's
22 incorrect?

23 A. On probably a specific aircraft even. I can't
24 even -- I don't know -- yeah. I have -- I have no idea
25 how this was prepared or by whom.

Transcript of Angela Svonavec
Conducted on November 4, 2024

140

1 Q. (BY MR. KRASIK) Okay.

2 A. But it's inaccurate.

3 Q. You don't know how it was prepared by whom, but
4 you just know it was inaccurate?

5 MR. COLIN: Well, I -- objection; form.

6 MR. KRASIK: I -- that's a question.

7 MR. COLIN: Object to form.

8 A. 100% know it's inaccurate as to my whereabouts.

9 Q. (BY MR. KRASIK) Okay.

10 A. I 100% know my whereabouts in those months.

11 Q. Okay. But just relying on this document
12 because that's what we have, it says you were in
13 Pennsylvania between March 31, 2024, and June 30, 2024.
14 Isn't that correct?

15 MR. COLIN: Object to form.

16 A. That's what the inaccurate form says.

17 Q. (BY MR. KRASIK) Okay. And then it says you
18 refer -- you returned to Florida on 6-30-2024 and the
19 next listing is you came back to Pennsylvania on July 4,
20 2024. Do you see that?

21 A. I remember that trip.

22 Q. Okay. And then the next listing on this
23 document is that you went back to Naples on September 1,
24 2024. Do you see that?

25 A. I can't read it. So I rely on you reading it

Transcript of Angela Svonavec
Conducted on November 4, 2024

141

1 to me, but I don't see -- because it's teeny.

2 Q. Okay. The next flight listed for you is from
3 Pennsylvania to Naples on September 1, 2024. That would
4 indicate you were in Pennsylvania between July 4th,
5 2024, and September 1, 2024?

6 MR. COLIN: Object to form.

7 Q. (BY MR. KRASIK) Is that information correct?

8 MR. COLIN: Object to form.

9 A. I was not in Pennsylvania all that time. They
10 obviously have -- flights I've gone to other places are
11 not on here.

12 Q. (BY MR. KRASIK) What other flights?

13 A. From July until -- well, there were quite a
14 few. I'd have to pull up my travel log, but I've been
15 various places over the summer.

16 Q. Where?

17 A. I have been to Rhode Island. Is it -- yeah,
18 Newport. I've been to Jackson Hole. I've been to --
19 I've been to some tractor pulls. Can't tell you all the
20 names of those towns, but it's on my travel logs.
21 Probably was at some auctions.

22 Q. Auctions where?

23 A. Out of state. It -- it would all be -- I can't
24 have exact recall on this, but I wasn't all summer in
25 Pennsylvania.

Transcript of Angela Svonavec
Conducted on November 4, 2024

142

1 Q. How did you travel to these other places?

2 A. Some on this plane. That's how it's inaccurate
3 too. So I'm not -- I'm not sure who does this or how
4 complete it was, because there's a lot of missing data
5 from my summer.

6 Q. Your testimony is you flew to Rhode Island on
7 your plane --

8 A. Uh-huh.

9 Q. -- private plane and you flew to Jackson Hole
10 on your private plane?

11 A. And -- and auctions and tractor pulls.

12 Q. And where were those auctions and tractor
13 pulls?

14 A. Let me think. You know, it's on my travel
15 logs. The -- there's so many tractor pulls. There's
16 one every weekend. I don't go to them all, so -- and
17 they're -- they're all logged, the ones that I went to.

18 Q. Where were any of them?

19 A. Well, they're in Ohio. They're in Bowling
20 Green, they're in Chapel Hill, Tennessee, they're in --
21 oh, I can't remember all the places. Tomah, Wisconsin.
22 Is Tomah Wisconsin? They're all tiny little towns.

23 Q. And your testimony is you flew there on your
24 private plane also?

25 A. I flew to some of them. And they're logged in

Transcript of Angela Svonavec
Conducted on November 4, 2024

143

1 my travel logs.

2 Q. But they're not --

3 A. If you weren't provided those, then I'm sure we
4 can get them. I snapped shots of all of them.

5 Q. Okay. The last entry on this document, what we
6 were provided is a flight from Naples back to
7 Pennsylvania on September 5th, 2024. So you flew to --
8 from Pennsylvania to Florida on September 1, 2024, and
9 then back from Florida to Pennsylvania on September 5,
10 2024. And that's the last entry. Have you been in
11 Pennsylvania -- well, you're not now. When did you
12 return to Florida?

13 A. That's why I'm saying it's inaccurate. Here I
14 sit. I didn't levitate here, and I've been here through
15 the last two hurricanes, Helene and Milton.

16 Q. Okay. So when did you come back to Florida?

17 A. I don't know the exact date, but it's on my
18 travel logs.

19 MR. KRASIK: Well, I'll again reiterate
20 that if there's any evidence to corroborate what
21 Ms. Svonavec's testimony is, we need that.

22 MR. COLIN: Understood.

23 Q. (BY MR. KRASIK) Based on the dates in this
24 document, Ms. Svonavec, if you count them up, you were
25 in Pennsylvania for 150 days prior to September 1. Is

Transcript of Angela Svonavec
Conducted on November 4, 2024

144

1 it your testimony that's not accurate?

2 A. That's not accurate. 100% not accurate.

3 Q. Okay. If there's any evidence to corroborate
4 that, we expect and need its production.

5 (Deposition Exhibit No. 17 marked)

6 Q. (BY MR. KRASIK) Showing you what I've marked
7 Exhibit 17. Ms. Svonavec, I'm showing you a document
8 that was filed with the Commonwealth of Pennsylvania
9 Department of State changing the name of Heritage House
10 Coal, LLC, to Banshee Industries, LLC.

11 A. Okay.

12 Q. Do you see that?

13 A. Yes.

14 Q. Okay. And this was filed on -- see, August --
15 where is that date? Oh. If you look at the bottom,
16 Jason Svonavec, who's listed as the member, files this
17 on August 14th, 2023. Do you see that?

18 A. Yes.

19 Q. Okay. Do you know why the name of -- was
20 changed from Heritage House Coal, LLC, to Banshee
21 Industries, LLC?

22 A. Yes.

23 MR. COLIN: Object to form. Go ahead.

24 A. Yes. That was part of the agreement with KTRV.
25 When they bought Heritage Coal and Natural Resources

Transcript of Angela Svonavec
Conducted on November 4, 2024

145

1 they wanted the name of this company changed to prevent
2 confusion.

3 Q. (BY MR. KRASIK) And that -- so that -- that --
4 the transaction was discussed in August of 2023?

5 A. I don't know when it was discussed. But
6 they -- the Heritage -- both of them are -- have offices
7 in Meyersdale and so the Heritage House Coal name we
8 took off to not confuse it with the ownership of the
9 newly acquired KTRV entity. So that was why it was
10 changed. When it was changed, I have no idea.

11 Q. Okay. This document lists the address of
12 Banshee Industries, LLC, as 550 Beagle Road. Do you see
13 that in Rockwood?

14 A. Uh-huh.

15 Q. Is that still the address of Banshee
16 Industries, LLC?

17 A. It's the mailing address for the same reason as
18 all the others. Everything is mailed to the same box.

19 Q. Okay. Are you aware of any filing with the
20 Commonwealth of Pennsylvania Department of State on
21 behalf of Banshee Industries after this date?

22 A. It was transferred to me at some point.

23 Q. I understand that, but are you aware of any
24 filing with the State after this date?

25 A. Wouldn't you have to file with the State to

Transcript of Angela Svonavec
Conducted on November 4, 2024

146

1 transfer it to me?

2 Q. No. That's the question I'm asking you. We're
3 not aware of anything filed with the State after this
4 date on behalf of Banshee Industries, and I'm asking if
5 you were aware of anything.

6 A. I definitely signed things, so I know my
7 attorney handled it.

8 MR. COLIN: Mr. Krasik is -- Mr. Krasik, is
9 it? Krasik?

10 MR. KRASIK: It's Krasik. It's fine.

11 MR. COLIN: Krasik. Mr. Krasik is asking
12 you a specific question. Are you aware of any other
13 papers that were filed -- filed with the Pennsylvania
14 Secretary of State after 8-14-23?

15 A. I don't know.

16 Q. (BY MR. KRASIK) Okay. Okay.

17 (Deposition Exhibit No. 18 marked)

18 Q. (BY MR. KRASIK) I'm going to show you two
19 documents together, Ms. Svonavec. This is 18.

20 MR. KRASIK: This is hers. This is yours.

21 MR. COLIN: Thank you.

22 MR. KRASIK: And I'll give you 19. This
23 will be 19.

24 (Deposition Exhibit No. 19 marked)

25 MR. KRASIK: This is hers and this is

Transcript of Angela Svonavec
Conducted on November 4, 2024

147

1 yours.

2 MR. COLIN: Thank you.

3 Q. (BY MR. KRASIK) So I'm showing you together
4 the operating agreements for Angela's Interest, LLC,
5 which is 18, and Jason's Interest, LLC, which is 19. Do
6 you see that?

7 A. Yes.

8 Q. All right. And when were these corporations
9 formed?

10 A. I don't know.

11 Q. Well, it says on the -- at the first paragraph
12 that the operating -- it says for each. This operating
13 agreement has been adopted as of this 7th day of
14 August 2023. Do you see that?

15 A. Yes.

16 Q. Okay. So I understood from this they were
17 formed on August 7th, 2023. Do you have any other
18 understanding?

19 MR. COLIN: Object to form. Just because
20 an operating agreement is adopted, doesn't necessarily
21 mean it wasn't form -- it was formed on the same day. I
22 mean --

23 MR. KRASIK: Okay.

24 MR. COLIN: But if she knows then -- you
25 answer if you -- if you know when these entities were

Transcript of Angela Svonavec
Conducted on November 4, 2024

148

1 formed, you may answer.

2 A. I'm trying to remember. I thought they were
3 formed back in the beginning of the year, but I don't
4 know for sure.

5 Q. (BY MR. KRASIK) Okay. Does Angela's Interest,
6 LLC, maintain corporate books and records?

7 A. I don't know. My accountant and lawyer -- my
8 accountant and attorneys handle it all.

9 Q. You are the 100% owner of Angela's Interest,
10 LLC. Is that correct?

11 A. That's my understanding. Yes.

12 Q. So again, question, does Angela's Interest --
13 as the owner of Angela's Interest, LLC, does Angela's
14 Interest, LLC, maintain corporate books and records?

15 MR. COLIN: Form objection.

16 A. I don't know.

17 Q. (BY MR. KRASIK) Okay. Do you know if Jason's
18 Interest, LLC, maintains corporate books and records?

19 A. I do not.

20 Q. Does Angela's Interest, LLC, hold annual
21 meetings?

22 A. I don't know.

23 Q. As the owner of Angela's Interest, LLC, have
24 you ever attended an annual meeting?

25 A. I attend meetings with my attorney and

Transcript of Angela Svonavec
Conducted on November 4, 2024

149

1 accountant all the time.

2 Q. Was it for the purpose of an annual meeting of
3 Angela's Interest, LLC,?

4 A. I don't recall.

5 Q. Do you not recall or you don't know?

6 A. I don't recall.

7 Q. Because they mean two different things. Right?

8 A. Right. I don't recall what was discussed in
9 all those meetings.

10 Q. Okay. So it might not have been an annual
11 meeting of Angela's Interest, LLC?

12 A. I don't know.

13 Q. Right. I think that's the real answer is you
14 don't know, not that you don't recall. You just don't
15 know?

16 A. I don't recall what was discussed, yes.

17 Q. Well, you don't know if it ever happened, do
18 you?

19 A. I -- I don't have a recollection of it.

20 Q. Okay. Do you know if an annual meeting was
21 ever held for Jason's Interest, LLC?

22 A. No.

23 Q. Do you know if there are minutes of any
24 meetings of Angela's Interest, LLC?

25 A. I don't know.

Transcript of Angela Svonavec
Conducted on November 4, 2024

150

1 Q. As the -- as the owner of Angela's Interest,
2 LLC, have you ever seen any minutes of any meetings of
3 Angela's Interest, LLC?

4 A. I've seen lots of minute books and I don't
5 remember for which company each of them are. So, no.

6 Q. My question is specific to Angela's Interest,
7 LLC.

8 A. I don't specifically recall.

9 Q. Do you know if there are any?

10 A. Don't specifically recall.

11 Q. My question was different. Do you know if
12 there are any? Do you know if there are minutes for any
13 single meeting of Angela's Interest, LLC?

14 A. I don't recall.

15 Q. Do you know?

16 MR. COLIN: Mr. Krasik is asking you not as
17 if you remember attending one. Mr. Krasik is asking you
18 if you know whether or not any meetings were held or any
19 minutes kept. Do you know that? If you don't know,
20 then you don't know.

21 A. Yeah, I don't know for which businesses.

22 MR. COLIN: He's asking you specific to --
23 to Angela's Interest.

24 A. I don't know. I don't know specifically.

25 MR. COLIN: Okay.

Transcript of Angela Svonavec
Conducted on November 4, 2024

151

1 Q. (BY MR. KRASIK) Same question for Jason's
2 Interest, LLC. Do you know if --

3 A. I have no idea.

4 Q. -- there were minutes or meetings?

5 A. No idea.

6 Q. Do you know why both the operating agreements
7 of Angela's Interest, LLC, and Jason's Interest, LLC,
8 were adopted on the same day, August 7th, 2023?

9 A. I don't know.

10 Q. Okay. Looking at Angela's Interest, the
11 operating agreement for Angela's Interest, LLC,
12 Exhibit 18, you executed that agreement as the member,
13 didn't you?

14 A. Yes.

15 Q. Okay. And that's your signature on page 5?

16 A. Yes.

17 Q. Okay. Who signed the operating agreement of
18 Jason's Interest, LLC?

19 MR. COLIN: Object to form.

20 A. I don't see it.

21 MR. KRASIK: What's the form objection to
22 who signed the operating agreement?

23 MR. COLIN: Well, if she didn't, then --

24 MR. KRASIK: Well, we don't know that yet.

25 THE WITNESS: Yeah.

Transcript of Angela Svonavec
Conducted on November 4, 2024

152

1 MR. KRASIK: She can answer.

2 THE WITNESS: Not me. It's not me.

3 MR. COLIN: I didn't say she couldn't
4 answer. I just said -- okay. Maybe I was getting ahead
5 of myself, but it seems as though that's calling for
6 speculation, but I'll -- I'll withdraw my form
7 objection. Go ahead.

8 Q. (BY MR. KRASIK) Who signed the operating
9 agreement for Jason's Interest, LLC?

10 A. Well, I assume it was Jason, but I don't know
11 for 100%. I didn't witness him.

12 Q. Okay. For -- if you could, can you turn to the
13 last page of the document of Exhibit 19?

14 A. 19?

15 Q. Uh-huh. And if you would look at the second
16 entry from the bottom, do you know why it says that it
17 was signed by Angela Svonavec?

18 A. Oh, because he can't open it in his phone.

19 Q. Did you sign the operating agreement for
20 Jason's -- excuse me. Let me finish my question. Did
21 you sign the operating agreement of Jason's Interest,
22 LLC, for Jason Svonavec?

23 A. Not that I recall, but many times I've pulled
24 it up for him on my phone because he doesn't know how to
25 pull it up.

Transcript of Angela Svonavec
Conducted on November 4, 2024

153

1 Q. Okay. If you look -- turn back to page 5 of
2 this document, not the last page, the page before that,
3 isn't this your handwritten signature for Jason's
4 Svonavec?

5 MR. COLIN: Object to form.

6 A. No, I -- I don't really recognize that. That's
7 why I wasn't sure it was Jason's, but it's not my
8 signature either.

9 Q. (BY MR. KRASIK) Your testimony under oath is
10 that you did not sign this document on behalf of Jason
11 Svonavec?

12 A. No, my testimony is I do not recall that at
13 all. Yeah, I do not --

14 Q. And even though the Docusign says that Jason --
15 the operating agreement for Jason's Interest, LLC, was
16 signed for Angela Svonavec, you dispute that?

17 MR. COLIN: Object to form.

18 A. I don't know. I don't recall it.

19 Q. (BY MR. KRASIK) So it's possible you did?

20 MR. COLIN: Object to form.

21 A. It would be highly unusual. I can't think of a
22 reason, other than helping him pull up his documents.

23 Q. (BY MR. KRASIK) Is it possible that you signed
24 this operating agreement for Jason Svonavec?

25 MR. COLIN: Object to form.

Transcript of Angela Svonavec
Conducted on November 4, 2024

154

1 A. Can -- can we talk about how it was signed?

2 You're saying it was electronically signed. Correct?

3 Q. (BY MR. KRASIK) I'm not saying anything other
4 than what the Dropbox --

5 A. Dropbox.

6 Q. -- record says.

7 A. I don't recall anything about it.

8 Q. But do you see where it says signed by Angela
9 Svonavec?

10 A. I do see that.

11 Q. Okay. Does that mean that you signed this
12 document on behalf of Jason Svonavec?

13 A. I don't think that's what it means. I don't
14 think it's conclusive of that.

15 Q. And your testimony under -- whether it's
16 conclusive or not I'm asking your testimony about it.

17 A. Because I don't understand enough about
18 electronics. Does it mean it was opened on my computer
19 and signed? I don't know. I don't know what that
20 means. I don't recall anything about that.

21 Q. Okay. And looking back at page 5, it's your
22 testimony that that's not your signature on page 5?

23 A. No. No, my signature looks like this, on page
24 5 of mine.

25 Q. Have you signed documents --

Transcript of Angela Svonavec
Conducted on November 4, 2024

155

1 A. They're not even remotely close.

2 Q. Have you signed documents for Jason Svonavec?

3 A. I have, yes.

4 Q. What documents are you thinking of that you've
5 signed for Jason Svonavec?

6 A. I have signed, like, checks. Actually there's
7 a stamp, but they have my stamp at the office as well.

8 Q. Anything else?

9 A. I can't recall anything specific.

10 Q. Do you recall that there were other instances?

11 A. I recall there were times I needed the stamp.

12 Q. Do you recall signing your signature --

13 MR. COLIN: I'll object to the form. Does
14 that -- is using the stamp signing in context of your
15 question? Let him clarify.

16 MR. KRASIK: Right.

17 Q. (BY MR. KRASIK) So your testimony is you used
18 a stamp of Jason Svonavec's signature?

19 A. Yes, I have.

20 Q. Okay. Other than that, have you given any wet
21 signature, it's sometimes called, on behalf of Jason
22 Svonavec?

23 A. Not anything specific I can recall.

24 Q. Okay. Looking back at Jason's Interest, LLC,
25 page 5, the signature we were looking at, is that

Transcript of Angela Svonavec
Conducted on November 4, 2024

156

1 Jason's signature? No, look at yours. You have it.

2 A. Yeah. 19?

3 Q. Exhibit 19, page 5. Is that Jason Svonavec's
4 signature?

5 A. I'm not sure.

6 Q. You've been married to him for 24 years. You
7 don't know his signature?

8 A. It -- it's similar to -- I mean, he's a
9 scribbler, so it could be and it's very small and I
10 can't see well right now. Like I told you, it's
11 minuscule on here. So it would be something to ask him,
12 I think. I don't know.

13 Q. Well, I'm asking you first. Is this Jason
14 Svonavec's signature?

15 MR. COLIN: All right.

16 A. I don't know.

17 MR. COLIN: Objection; asked and answered.
18 I mean, she said -- she said she doesn't know.

19 Q. (BY MR. KRASIK) So the answer is I don't know?

20 A. I truly don't know.

21 Q. Okay.

22 A. I've said it like ten times.

23 MR. COLIN: All right. Okay. Okay.

24 Q. (BY MR. KRASIK) I'm showing you what I've
25 marked Exhibit 20.

Transcript of Angela Svonavec
Conducted on November 4, 2024

157

1 (Deposition Exhibit No. 20 marked)

2 Q. (BY MR. KRASIK) I'm showing you what is a
3 membership interest assignment agreement assigning the
4 interest of Banshee Industries from Jason Svonavec
5 personally to Jason's Interest, LLC. Do you see that in
6 the first paragraph?

7 A. Membership -- Jason Svonavec and Jason -- yes.

8 Q. Okay. And this membership interest assignment
9 agreement is effective as of August 31, 2023. Do you
10 see that?

11 A. Yes.

12 Q. Okay. Do you know why the membership interest
13 in Banshee Industries, LLC, was assigned from Jason
14 Svonavec to Jason's Interest, LLC?

15 A. I do not.

16 Q. You weren't part of that decision?

17 A. No. No. I mean, my attorney has been
18 reorganizing our companies.

19 Q. Okay. So you don't know why it was assigned
20 and you weren't part of the decision to assign it from
21 Jason's Svonavec personally to Jason's Interest, LLC?

22 A. I don't know why. I was probably in the
23 discussions when Gabby was making recommendations, but I
24 don't know why.

25 Q. Okay. Do you know if anything was filed with

Transcript of Angela Svonavec
Conducted on November 4, 2024

158

1 the State of Pennsylvania about this assignment?

2 A. I don't know.

3 Q. Okay. Would you turn to the second page. Is
4 that your signature on behalf of Jason Svonavec as the
5 assignor and assignee?

6 A. You're asking if it's my signature --

7 Q. Uh-huh.

8 A. No, it's not my signature.

9 Q. You deny that?

10 A. It's -- it's definitely not my signature.

11 Q. Okay.

12 MR. COLIN: Are --

13 A. I have a big loopy A.

14 MR. COLIN: Stop, stop, stop, stop, stop,
15 stop, stop, stop. Let me ask Mr. Krasik a clarifying
16 question. Are you asking her if she wrote this
17 signature --

18 MR. KRASIK: Yes.

19 MR. COLIN: -- on this paper?

20 MR. KRASIK: Yes.

21 MR. COLIN: Answer that question. Did you
22 write this signature on this paper?

23 A. Oh, I have no idea. I thought you were asking
24 me, is it my signature.

25 Q. (BY MR. KRASIK) I apologize. Thank you for

Transcript of Angela Svonavec
Conducted on November 4, 2024

159

1 helping to clarify that.

2 A. Yeah.

3 Q. You don't know if you physically signed for
4 Jason Svonavec on this document?

5 MR. COLIN: No, that's not -- that's not
6 what she said. Or is it?

7 Q. (BY MR. KRASIK) No, I think she's saying it's
8 not hers -- it's not Angela Svonavec's signature.
9 Correct?

10 A. Yeah, that's what I'm saying.

11 Q. I'm asking if you physically signed for Jason
12 Svonavec as assignor or assignee on this document.

13 A. It could be a stamp, but I don't know. I don't
14 recall.

15 Q. Okay. Is it possible it's also your
16 handwritten signature for him?

17 A. It's not impossible, but I don't know.

18 Q. When you say it's not impossible, why do you
19 say that?

20 A. Because I don't know.

21 MR. COLIN: Was that 20?

22 MR. KRASIK: That was 20. Yeah.

23 (Deposition Exhibit No. 21 marked)

24 Q. (BY MR. KRASIK) There's 21. Showing you what
25 I've marked as Exhibit 21, Ms. Svonavec. This is a

Transcript of Angela Svonavec
Conducted on November 4, 2024

160

1 filing that you, through your attorneys, made in this
2 case.

3 MR. COLIN: Can we say Banshee Industries,
4 LLC, made this filing?

5 MR. KRASIK: I apologize.

6 MR. COLIN: That's why I asked.

7 Q. (BY MR. KRASIK) That Banshee Industries, LLC,
8 made through its attorneys in this case. And I'd like
9 to specifically direct your attention to what's
10 attached. Exhibit 1 is an affidavit in support of
11 motion to remand by you and Exhibit 2 is an affidavit in
12 support of motion for remand by Jason Svonavec. Do you
13 see that?

14 A. Yes.

15 Q. Okay. And I'd like you to open the signature
16 from the operating agreement of Jason's Interest, LLC,
17 that we were looking to a moment ago, Exhibit 19.

18 A. 19.

19 Q. Is this the same signature on Exhibit 21 as on
20 Exhibit 19?

21 MR. COLIN: Object to form.

22 A. I don't know. They're all scribbles to me.

23 Q. (BY MR. KRASIK) Okay. Did you sign Exhibit 21
24 on behalf of Jason Svonavec?

25 A. Before a notary public? No, I don't even know

Transcript of Angela Svonavec
Conducted on November 4, 2024

161

1 who that is, that notary public.

2 Q. We'll get there in a minute. My question is,
3 did you sign Exhibit 21 on behalf of Jason Svonavec?

4 A. I -- I don't know, but that's not how I sign
5 either.

6 Q. What --

7 A. I don't know. I don't know.

8 Q. Is it possible that you signed Exhibit 21 on
9 behalf of Jason Svonavec?

10 A. I don't know.

11 Q. This is dated October 8th. This is less than a
12 month ago. You don't remember?

13 A. I don't. You think I'd remember because I'm
14 supposedly in front of this person and I don't.

15 Q. So this is like three weeks ago now, you don't
16 know if you signed Exhibit 21 on behalf of Jason
17 Svonavec?

18 MR. COLIN: Okay. Objection; asked and
19 answered. She said she don't know.

20 A. I don't know.

21 Q. (BY MR. KRASIK) Okay. You said you don't know
22 who Laura Williams is. Is that true you don't know
23 Laura Williams?

24 A. I need more context, like where is she from,
25 where she works.

Transcript of Angela Svonavec
Conducted on November 4, 2024

162

1 Q. Okay. I will represent to you she's at the
2 Morella Law Firm.

3 A. Okay.

4 Q. Were you at the offices of Morella Law Firm on
5 October 8th?

6 A. No.

7 Q. Was Jason?

8 A. Well, he could have been.

9 Q. Well, let's turn back to your affidavit in
10 support of the motion for remand.

11 A. I do remember Fed Ex'ing paperwork.

12 Q. Okay. Were you in the offices of the Morella
13 Law Firm on October 8th, 2024?

14 A. I've never been in the offices.

15 Q. So when this notary says, sworn to before me
16 this 8th day of October, 2024, by Angela Svonavec, you
17 weren't standing in front of her?

18 A. Unless she came to me.

19 Q. Did she come to you?

20 A. I don't know.

21 Q. This is three weeks ago.

22 A. I don't know. I'm sorry. I wish I knew, but I
23 don't know. I cannot remember three days ago.

24 Q. Okay. You were not in the offices of the
25 Morella Law Firm on October 8th, 2024?

Transcript of Angela Svonavec
Conducted on November 4, 2024

163

1 MR. COLIN: Objection; asked an answered.

2 Q. (BY MR. KRASIK) Is that your testimony?

3 A. Correct.

4 Q. Okay. You're saying it's possible a notary
5 from the Morella Law Firm came to you on October 8th,
6 2024?

7 A. That's possible.

8 Q. Okay. Where were you on October 8th?

9 A. I don't know.

10 Q. Were you in Pennsylvania or were you in
11 Florida?

12 A. I would have been here.

13 Q. Okay. Did somebody from the Morella Law Firm
14 fly down to Florida on October 8th when you signed this?

15 A. People fly in to see me every week. I don't
16 have a recall on that. You'd have to check -- you'd
17 have to ask them.

18 Q. Do you remember three weeks ago on October 8th
19 did some --

20 A. I don't remember.

21 Q. -- notary from Pittsburgh fly down to see you?

22 A. I don't remember.

23 Q. That's your testimony under oath?

24 A. I have --

25 MR. COLIN: Objection; asked and answered.

Transcript of Angela Svonavec
Conducted on November 4, 2024

164

1 Don't answer that.

2 MR. KRASIK: That's a different -- that's a
3 different question.

4 MR. COLIN: How is it different?

5 MR. KRASIK: I'm asking if that's her
6 testimony under oath.

7 A. Because I don't recall.

8 MR. COLIN: I just -- in --

9 MR. KRASIK: Because that's incredulous.

10 MR. COLIN: There is --

11 A. It's not incredulous.

12 MR. COLIN: Stop.

13 THE REPORTER: Everybody's talking at one
14 time.

15 Q. (BY MR. KRASIK) Okay. Do you have the
16 question? So we've established you were not at the
17 office of Morella Law Firm October 8th. That, we know.

18 A. Correct. We do know that.

19 Q. Okay. All right. So when Ms. Williams says
20 sworn to and before me this 8th day of October, you were
21 not before her. Correct?

22 MR. COLIN: Object to the form. You may
23 answer.

24 Q. (BY MR. KRASIK) Correct.

25 A. I was not in Pittsburgh.

Transcript of Angela Svonavec
Conducted on November 4, 2024

165

1 Q. So you were not in front of Laura Williams,
2 notary public --

3 A. In Pittsburgh.

4 Q. -- in Allegheny County?

5 A. Correct.

6 Q. Okay. Do you know if Jason Svonavec was
7 standing in front of Laura Williams on October 8th,
8 2024?

9 A. I don't know.

10 Q. You don't know?

11 A. Huh-uh.

12 Q. Okay. And this signature for Jason Svonavec,
13 you don't know if it's your signature for him?

14 A. I mean, if it is, I'm really good because that
15 really looks like him to me, but --

16 MR. COLIN: That -- that's not what
17 Mr. Krasik is asking.

18 A. I don't know. I don't know.

19 MR. COLIN: Please let me clarify the
20 question so that we have a clean record. Did you write
21 this signature on this last page of Exhibit 21 where it
22 says Jason Svonavec? Did you write this signature?

23 THE WITNESS: I don't know.

24 Q. (BY MR. KRASIK) Okay.

25 MR. COLIN: That's her answer.

Transcript of Angela Svonavec
Conducted on November 4, 2024

166

1 (Deposition Exhibit No. 22 marked)

2 Q. (BY MR. KRASIK) I'll show you 22.

3 MR. COLIN: Would it be helpful -- I'm
4 sorry, Mr. Krasik. Would it be helpful going forward
5 when you're talking about signatures to frame the
6 question the way I framed it, which is to say, did you
7 write this signature? Because I think we're getting a
8 lot of confusion on the issue of that -- that wording.

9 MR. KRASIK: I don't think so, but I will
10 try to make it as clear as possible.

11 MR. COLIN: Fair enough. Thank you.

12 Q. (BY MR. KRASIK) Ms. Svonavec, what I've shown
13 you is Exhibit 22, which is the membership interest
14 assignment agreement of Banshee Industries, LLC, from
15 Jason's Interest, LLC, to you personally. Do you see
16 that?

17 A. Yes.

18 Q. Okay. Why was the ownership of Banshee
19 Industries, LLC, assigned from Jason's Interest, LLC, to
20 you personally?

21 A. At the direction of our attorney.

22 Q. And who was that attorney?

23 A. Gabby.

24 Q. Okay. Without disclosing to me the substance
25 of any communications with your attorney, were you part

Transcript of Angela Svonavec
Conducted on November 4, 2024

167

1 of communications about this decision?

2 A. Yes.

3 Q. Okay. And those were all with -- with your
4 attorney?

5 A. Yes.

6 Q. Okay. Do you know if anything was filed with
7 the Commonwealth of Pennsylvania regarding this
8 assignment?

9 A. Is that what this is?

10 Q. No.

11 A. Then I don't know.

12 Q. Okay. If you look on page 1 to one, two,
13 three, four paragraphs down, it says, now, therefore,
14 for good and valuable consideration, the receipt and
15 sufficiency of which is hereby acknowledged, and
16 intending to be legally bound, the parties hereby agree
17 as follows and then it goes on. When I first read for
18 good and valuable consideration -- what consideration
19 did you give in exchange for this agreement?

20 A. I don't know.

21 MR. COLIN: Object to form.

22 Q. (BY MR. KRASIK) You don't know?

23 A. Huh-uh.

24 Q. Did you give any consideration?

25 A. I don't know.

Transcript of Angela Svonavec
Conducted on November 4, 2024

168

1 Q. Do you know what consideration means?

2 A. Huh-uh.

3 Q. Did you give anything in exchange for the
4 rights that were granted to you under this agreement?

5 A. I don't know because the lawyers and the
6 accountants handle it all.

7 Q. Okay. Do you know if you received --

8 A. I don't know.

9 Q. -- anything of value --

10 A. I don't know.

11 Q. -- in exchange for this agreement?

12 A. I don't know.

13 Q. As you sit here today can you identify anything
14 of value that you received or you gave, excuse me, in
15 consideration for the rights granted to you under this
16 agreement?

17 MR. COLIN: Objection; asked and answered.

18 MR. KRASIK: Would you like the question
19 read back?

20 MR. COLIN: No.

21 MR. KRASIK: I'm going to need an answer to
22 that question.

23 MR. COLIN: Why is that -- how is that any
24 different from the three preceding questions that you
25 just asked her?

Transcript of Angela Svonavec
Conducted on November 4, 2024

169

1 A. I don't know.

2 Q. (BY MR. KRASIK) Okay.

3 A. I don't handle it. People handle this all for
4 me.

5 Q. Okay. Do you know if there was anything of
6 value that you gave in exchange for the rights
7 granted --

8 A. I don't know.

9 Q. -- under this agreement?

10 A. I don't know.

11 Q. Okay. Who else might know that answer if there
12 was --

13 A. My attorney.

14 Q. Okay. From your perspective was this like a
15 gift to you?

16 A. I didn't have a perspective on it. I don't
17 know.

18 Q. You don't know if you gave anything of
19 consideration -- anything of value and you don't know if
20 it was a gift to you?

21 A. Correct. The attorneys and accountants handle
22 that.

23 Q. Okay.

24 A. That's a designation they would know.

25 Q. Okay. Looking at the date of the agreement it

Transcript of Angela Svonavec
Conducted on November 4, 2024

170

1 says it's effective 1st day of June 2024. Was there a
2 reason that you wanted this to be effective June 1,
3 2024?

4 A. My attorney made that decision. I have no
5 idea.

6 Q. Okay. You don't know of a reason why?

7 A. I don't.

8 Q. Okay. But the agreement wasn't executed on
9 June 1, 2024, was it?

10 A. I don't know when it was executed.

11 Q. Okay. Well, if you look at the Docusign
12 receipt at the end for both you and Jason, it says
13 viewed and signed on August 2nd, 2024. Do you see that?

14 A. Yes.

15 Q. Okay. So if it -- if the Docusign receipt says
16 it was signed on August 2nd, '24, do you know why this
17 agreement is effective as of June 1, 2024?

18 A. I do not know.

19 Q. Do you know why the membership interest in
20 Banshee Industries, LLC, was assigned to you personally?

21 A. My attorney suggested that.

22 MR. KRASIK: We'll mark this at the same
23 time and talk about them together.

24 (Deposition Exhibit No. 23 marked)

25 Q. (BY MR. KRASIK) Let me show you what I've

Transcript of Angela Svonavec
Conducted on November 4, 2024

171

1 marked as Exhibit 23. Ms. Svonavec, this is a
2 contribution agreement also effective as of June 1,
3 2024, between you and Angela's Interest, LLC, with
4 respect to the membership interest of Banshee
5 Industries, LLC. Do you see that?

6 A. Yes.

7 Q. Okay. We don't have a Docusign receipt for
8 this agreement to know when it was actually executed,
9 but it's made effective June 1, 2024, just like the
10 membership interest assignment agreement from Jason's
11 Interest, LLC, to you personally. Do you see that?

12 A. June 1st, yes.

13 Q. Okay. So my question is, if you turned around
14 the same day and assigned the interest of Banshee
15 Industries, LLC, to Angela's Interest, LLC, why was the
16 membership interest assignment agreement from Jason's
17 Interest, LLC, to you personally instead of being
18 between Jason's Interest, LLC, and Angela's Interest,
19 LLC, which is how it ended up later that same day?

20 MR. COLIN: Object to form.

21 A. That's how the attorney instructed it be done.

22 Q. (BY MR. KRASIK) Okay. Do you have an
23 understanding why it was done that way?

24 A. No.

25 Q. And so you said that's the attorney -- I'm

Transcript of Angela Svonavec
Conducted on November 4, 2024

172

1 sorry.

2 MR. KRASIK: Read back the answer. I don't
3 want to get it wrong.

4 THE REPORTER: The answer?

5 MR. KRASIK: Yeah. That's the way the
6 attorney --

7 THE REPORTER: Your question was, do you
8 have an understanding of why it was done that way? She
9 said, no.

10 MR. KRASIK: I thought --

11 Q. (BY MR. KRASIK) Okay. If I heard you right a
12 moment ago you said that the attorneys had -- had
13 instructed it be done that way?

14 A. (Moving head up and down).

15 Q. Is that right?

16 A. Yeah, Gabby handled all of this. She did all
17 the paperwork --

18 Q. Okay.

19 A. -- and sent --

20 Q. Okay. So Gabby, and that's Morella, made that
21 decision?

22 A. Uh-huh. Yes.

23 Q. Okay. And do you know if anything was filed
24 with the Commonwealth of Pennsylvania either about the
25 assignment from Jason's Interest, LLC, to you personally

Transcript of Angela Svonavec
Conducted on November 4, 2024

173

1 or the contribution from you personally to Angela's
2 Interest, LLC? Do you know if something was filed with
3 the State of Pennsylvania?

4 A. I don't know.

5 Q. Okay. If you would look at Exhibit 22, the
6 membership interest assignment agreement. And I'll ask
7 you to pull out Exhibit 20, the membership interest
8 assignment agreement between Jason Svonavec and Jason's
9 Interest, LLC. I'd like you to compare the signatures
10 for those two documents.

11 A. I have three documents.

12 Q. (BY MR. KRASIK) For Exhibit 22, Jason
13 Svonavec's signature is very different, isn't it?

14 A. Which number?

15 Q. 22.

16 A. 22. That's one of those stamps on Docusign.

17 Q. Right. It's a --

18 A. Yeah.

19 Q. It's a -- it's a -- what do they call it?

20 A. I know --

21 Q. Preselected style?

22 A. Uh-huh.

23 Q. Yes.

24 A. Yeah.

25 Q. So -- so the signature for Jason is a

Transcript of Angela Svonavec
Conducted on November 4, 2024

174

1 preselected style on Exhibit 22. Correct?

2 A. Yes.

3 Q. Okay. But it's very different on Exhibit 20?

4 A. Yes.

5 Q. Does this help to refresh your recollection
6 that you wrote Jason's signature on Exhibit 20?

7 A. No. It doesn't.

8 Q. Do you know why Jason picked a preselected
9 style to execute the membership interest assignment
10 agreement, but didn't do that on either the -- the
11 agreement between Jason Svonavec and Jason's Interest,
12 LLC, for the operating agreement of Jason's Interest,
13 LLC, or the affidavit that we looked at?

14 A. I don't know.

15 Q. You don't know?

16 A. I don't know.

17 (Deposition Exhibit No. 24 marked)

18 Q. (BY MR. KRASIK) I'm showing you what I've
19 marked as Exhibit 24.

20 THE WITNESS: Will we be able to take a
21 bathroom break again soon?

22 MR. KRASIK: Whenever you'd like. Would
23 you like now?

24 THE WITNESS: Yeah. And I don't know if
25 there's any snacks out there, but my blood sugar is

Transcript of Angela Svonavec
Conducted on November 4, 2024

175

1 getting super low.

2 THE VIDEOGRAPHER: We're going off the
3 record. The time is 1:32 p.m.

4 (Recess from 1:32 p.m. to 1:45 p.m.)

5 THE VIDEOGRAPHER: We are back on the
6 record. The time is 1:45 p.m.

7 Q. (BY MR. KRASIK) Ms. Svonavec, if I could
8 direct your attention back to Exhibit 22 for a final
9 question?

10 A. Uh-huh.

11 Q. Earlier I believe you said that you weren't
12 aware of any reason why the -- or any -- any need to
13 have the agreement effective June 1, 2024. Is that
14 right?

15 A. I'm -- I don't know specifically. I can't
16 recall what the meaning -- or the reason was.

17 Q. Okay. And do you recall if there was a reason?

18 A. Oh, I'm sure there's a reason.

19 Q. Okay. As we looked at on the Docusign, the --
20 this agreement was actually signed -- executed on
21 August 2nd, 2024. If you turn to the last page it shows
22 that.

23 A. Uh-huh. Yes.

24 Q. Okay. Do you know why that first paragraph of
25 the agreement wasn't updated to say effective August 2,

Transcript of Angela Svonavec
Conducted on November 4, 2024

176

1 2024, instead of leaving 1st day of June 2024?

2 A. I don't know why.

3 Q. Okay. You can put aside -- well, one more
4 question. I mean, is it -- is it accurate in your --
5 from your perspective that -- to say that this
6 membership interest assignment agreement was effective
7 June 1, 2024, if it wasn't executed until August 2nd,
8 2024?

9 A. Yes, I believe it was effective.

10 Q. It was basically being back dated?

11 A. I don't know. My attorney told me it was
12 effective for the date on here.

13 Q. Okay. Even though it wasn't signed for two
14 months later?

15 A. That was my understanding.

16 Q. Okay. All right. Let's look at Exhibit 24,
17 which is also before you. This is the amended and
18 restated operating agreement of Banshee Industries, LLC,
19 also adopted as of this June 1, 2024. Do you see that?

20 A. Sorry. Yes.

21 Q. Okay. We don't have a -- a DocuSign receipt
22 for this document. Do you recall when you actually
23 signed this amended and restated operating agreement
24 with Banshee Industries, LLC?

25 A. I don't know.

Transcript of Angela Svonavec
Conducted on November 4, 2024

177

1 Q. Don't know. Do you recall if it was on June 1,
2 2024?

3 A. I don't know.

4 Q. If -- well, I think we can agree it would have
5 had to have been August 2nd, 2024, or later. Right?
6 Because if the membership interest of Banshee wasn't
7 assigned to you personally until August 2nd, 2024, you
8 couldn't have signed an amended restated operating
9 agreement of Banshee Industries, LLC, by Angela's
10 Interest, LLC, before you were assigned the interest.
11 Right?

12 A. Yeah, I have no idea the order they came
13 through for signature in.

14 Q. Okay.

15 A. None.

16 Q. Okay. All right. If you look at paragraph 3
17 of Exhibit 24, paragraph 3A specifically.

18 A. Wait, I'm not --

19 Q. Oh, I'm sorry. Take your time.

20 A. So does that mean management?

21 Q. Under management. Yes.

22 A. Okay.

23 Q. 3A it says, member hereby appoints Angela
24 Svonavec to serve as the initial manager of the company?

25 A. Yes.

Transcript of Angela Svonavec
Conducted on November 4, 2024

178

1 Q. Okay. So you -- you are the manager of Banshee
2 Industries, LLC?

3 A. Correct.

4 Q. Okay. And please turn to paragraph 5 of this
5 document. It says under the heading, Compensation of
6 Manager, the manager shall be reimbursed for all
7 expenses incurred in managing the company. Let's stop
8 there.

9 A. I don't see that on page 5.

10 Q. No, I'm sorry. Paragraph 5.

11 MR. COLIN: Paragraph 5. Page 3.

12 Q. (BY MR. KRASIK) Apologies if I wasn't clear.

13 A. Okay. Page 3, paragraph 5. Okay.

14 Q. Under the heading, Compensation of Manager, the
15 manager shall be reimbursed for all expenses incurred in
16 managing the company. I'll stop there. Have you been
17 reimbursed for expenses by Banshee?

18 A. Not that I'm aware, but I don't track any of
19 the expenses or do the accounting.

20 Q. Well, you'd have to track the expenses. Right?
21 I mean, you -- how does your accountant know what
22 expenses to take?

23 A. I mail all the receipts and they organize
24 everything.

25 Q. Okay. So you keep track of the receipts and

Transcript of Angela Svonavec
Conducted on November 4, 2024

179

1 then you give those to your accountant. Right?

2 A. Well, if keeps track means throw them in a bag
3 and mail them up, that's what I do.

4 Q. Okay. Have you sought reimbursement for
5 expenses incurred in managing Banshee?

6 A. Not that I'm aware.

7 Q. Okay. If you look further in paragraph 5 under
8 Compensation of Manager it says, the manager -- it says,
9 reading further in the paragraph, the manager may at the
10 election of the member, be entitled to compensation for
11 management services rendered in an amount to be
12 determined from time to time by the member.

13 Have you been paid a management services
14 fee by Banshee?

15 A. I -- I think I have, but I -- I believe so, but
16 that's an accounting question. I receive -- I believe
17 so.

18 Q. Okay. I'm first asking, have you been paid.
19 And the answer is yes?

20 A. I've been paid by Banshee Industries.

21 Q. Okay. Do you know how much?

22 A. I don't.

23 Q. Okay. Do you know to what state or states that
24 compensation has been allocated?

25 A. I don't.

Transcript of Angela Svonavec
Conducted on November 4, 2024

180

1 Q. Would it be fair to say you've not paid state
2 taxes on it because Florida has no state tax?

3 A. I don't know.

4 Q. Well, you haven't paid Florida income tax.
5 Right?

6 A. I haven't handled any of it.

7 Q. Okay. Do you know if your management service
8 fee from Banshee has been allocated to Florida or
9 Pennsylvania?

10 A. I don't know.

11 Q. You'd agree with me Banshee doesn't operate in
12 Florida?

13 A. I don't know.

14 Q. Well, sure you do. Does -- does Banshee
15 Industries operate in Florida? Does it have business in
16 Florida?

17 A. I don't know.

18 Q. You're the owner of the company and you don't
19 know?

20 A. I don't know. I send everything back and the
21 accountants and attorneys make the decisions.

22 Q. Well, I'm talking about the operations of
23 Banshee. We -- earlier we talked about Banshee sells
24 coal, sells other forms of heating products?

25 MR. COLIN: Let me -- let me -- let me

Transcript of Angela Svonavec
Conducted on November 4, 2024

181

1 object to the form, because I think she said that she
2 has an office down here, so are you characterizing
3 office as part of operations?

4 MR. KRASIK: Well, it's coaching the
5 witness, by the way, but, no, I'm not. I don't think
6 those are operations. If she wants to say I have an
7 office, that's fine.

8 A. Well, the management was going to be my
9 question. Does the management count, because I manage
10 all of these companies from this location here and how
11 they break it out and allot it, I don't know till the
12 end of the year when --

13 Q. (BY MR. KRASIK) Does Banshee mine or produce
14 any products from Florida -- in Florida or from Florida?

15 A. I don't know everything that's sold up there,
16 so I don't know, but we manage all the employees.
17 Remember, it's the hiring hub.

18 Q. Yes. To your knowledge --

19 A. So all the employee management is done from
20 here.

21 Q. To your knowledge does Banshee sell, mine or
22 make anything from Florida?

23 A. Banshee doesn't do any mining. I don't know if
24 it sells or makes anything. I don't know.

25 Q. Okay. Who would know the answer to that

Transcript of Angela Svonavec
Conducted on November 4, 2024

182

1 question, if not the owner of the company?

2 A. Probably the lawyers.

3 Q. The lawyers? Okay.

4 A. It feels like a trick question. I don't know
5 what you're calling business and what is -- is not, so I
6 don't know.

7 Q. Does Banshee have any customers in Florida?

8 A. Customers come to Florida all the time.

9 Q. That wasn't my question.

10 A. I don't know.

11 Q. As the owner of the company you don't know who
12 your customers are?

13 A. I have thousands of customers.

14 Q. Are any of them in Florida?

15 A. I don't know. I don't check everybody's
16 address. I don't know.

17 Q. Okay.

18 A. I have -- in all kinds of states I have
19 customers.

20 Q. If Banshee focuses on heating supplies, does it
21 make sense that they would be selling to Florida?

22 A. That's just one segment of their business.

23 Q. What else?

24 A. We don't sell heating supplies in Florida. I
25 can answer that.

Transcript of Angela Svonavec
Conducted on November 4, 2024

183

1 Q. Okay. What part -- what part of their business
2 would they direct to Florida?

3 A. They're -- there's -- all the employees are
4 hired through Banshee Industries for all of these
5 companies and then some. So all that management is done
6 from here.

7 Q. Okay. That wasn't my question. Does Banshee
8 sell anything to Florida?

9 A. I don't know. I, at this point, cannot recall.
10 I don't know it.

11 Q. Okay. Does Banshee sell into Pennsylvania?

12 A. Some, yes.

13 Q. Okay. Is any part of your management service
14 fee allocated to Pennsylvania?

15 A. I don't know. That's a tax and lawyer
16 question. I have no idea.

17 Q. And Banshee's office is at 550 Beagle Road in
18 Rockwood. Right?

19 A. Banshee's office is at 338 Industrial Park Road
20 in Meyersdale.

21 Q. That wasn't alleged in this lawsuit that
22 Banshee's address is 550 Beagle Road?

23 A. Banshee Farm? Are you talking about Banshee
24 Industries?

25 Q. Banshee Industries.

Transcript of Angela Svonavec
Conducted on November 4, 2024

184

1 A. Banshee Industries, again, the physical
2 location of the office is 338 Industrial Park Road. The
3 mailing address is 550 Beagle Road.

4 Q. Okay. Both of those are in Rockwood?

5 A. No. One is in Meyersdale, one is in Rockwood.

6 Q. Both are in Pennsylvania?

7 A. Both are in Pennsylvania.

8 MR. KRASIK: All right. That concludes
9 this deposition on subject matter jurisdiction. We, of
10 course, reserve our right to take Ms. Svonavec's
11 deposition on the merits of the case at some later time
12 in these proceedings.

13 MR. COLIN: I have no questions. We'll
14 read.

15 THE VIDEOGRAPHER: Okay. Thank you. This
16 marks the end of the videotaped deposition of Angela
17 Svonavec and the time is 1:56 p.m.

18 MR. COLIN: Thank you.

19 THE REPORTER: Did you want to order a
20 copy?

21 MR. COLIN: Yeah. You've got my card
22 there?

23 THE REPORTER: I've got your card, yes.

24 MR. COLIN: PDF, searchable PDF? Is that
25 what you do?

Transcript of Angela Svonavec
Conducted on November 4, 2024

185

1 THE REPORTER: Yes. E-Tran? Okay.
2 (Deposition concluded at 1:56 p.m.)
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

Transcript of Angela Svonavec
Conducted on November 4, 2024

186

1

CHANGES AND SIGNATURE

2

WITNESS NAME: ANGELA SVONAVEC

3

DATE OF DEPOSITION: NOVEMBER 4, 2024

4

PAGE

LINE

CHANGE

REASON

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

Transcript of Angela Svonavec
Conducted on November 4, 2024

187

1 I, ANGELA SVONAVEC have read the foregoing
2 deposition and hereby affix my signature that same is
3 true and correct, except as noted above.

4
5 _____
6 ANGELA SVONAVEC
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

Transcript of Angela Svonavec
Conducted on November 4, 2024

188

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

HERITAGE HOLDING CO.,)
LLC, a Pennsylvania)
limited liability)
company,)

PLAINTIFF,)

VS.)

KTRV, LLC,)

DEFENDANT.)

Civil Action No.
2:24-cv-1448

BANSHEE INDUSTRIES, LLC,)
Pennsylvania limited)
liability company,)

PLAINTIFF,)

VS.)

HERITAGE COAL & NATURAL)
RESOURCES, LLC,)

DEFENDANT.)

Civil Action No.
3:24-cv-233

REPORTER'S CERTIFICATION
DEPOSITION OF ANGELA SVONAVEC
NOVEMBER 4, 2024

I, Jodi Goodman, Certified Shorthand Reporter,
hereby certify to the following:

That the foregoing deposition of ANGELA SVONAVEC,
the witness, hereinbefore named was, at the time named,
taken by me in stenograph on NOVEMBER 4, 2024 having
been first duly cautioned and sworn to tell the truth,

Transcript of Angela Svonavec
Conducted on November 4, 2024

189

1 the whole truth, and nothing but the truth, and the same
2 were thereafter reduced to typewriting by me or under my
3 direction.

4 I further certify that pursuant to FRCP Rule
5 30(f)(1) that the signature of the deponent:

6 ___XXX___ was requested by the deponent or a party
7 before the completion of the deposition and is to be
8 returned within 30 days from date of receipt of the
9 transcript. If returned, the attached Changes and
10 Signature Page contains any changes and the reasons
11 Therefor;

12 _____ was not requested by the deponent or a
13 party before the completion of the deposition.

14 I further certify that I am neither counsel for,
15 related to, nor employed by any of the parties in the
16 action in which this proceeding was taken, and further
17 that I am not financially or otherwise interested in the
18 outcome of the action.

19

20 GIVEN UNDER my hand of office on the 6th of November, 2024.


21

22

23

24

25



Jodi Goodman
Texas CSR No. 7033
Expiration Date: 10-31-26

Transcript of Angela Svonavec
Conducted on November 4, 2024

190

A			
able	50:10, 58:12	actual	advisement
60:14, 129:22,	accountant	133:7	114:22
174:20	23:20, 24:8,	actually	affidavit
about	113:12, 148:7,	7:12, 38:15,	160:10, 160:11,
11:20, 17:14,	148:8, 149:1,	60:5, 75:8,	162:9, 174:13
30:15, 30:21,	178:21, 179:1	75:22, 77:11,	affidavits
32:13, 40:23,	accountants	77:18, 77:23,	15:9
46:6, 48:7,	44:11, 98:20,	85:21, 89:5,	affiliated
51:3, 53:16,	99:22, 112:12,	99:14, 124:1,	50:6, 86:1
64:21, 65:9,	113:15, 113:25,	129:12, 155:6,	affiliation
65:23, 69:4,	114:4, 114:21,	171:8, 175:20,	50:7
69:23, 70:16,	168:6, 169:21,	176:22	affix
75:24, 75:25,	180:21	addition	187:2
76:3, 77:25,	accounting	114:23, 122:3	after
84:2, 92:2,	178:19, 179:16	additional	6:23, 8:3,
93:9, 93:16,	accuracy	137:24	9:15, 9:24,
93:24, 96:11,	124:9, 139:13	address	16:5, 30:5,
97:4, 97:5,	accurate	12:1, 14:5,	30:13, 56:14,
99:1, 111:3,	20:21, 44:17,	36:4, 36:23,	56:18, 58:3,
113:4, 116:14,	73:17, 73:23,	36:24, 38:5,	58:24, 70:10,
117:5, 117:10,	78:25, 86:11,	38:23, 39:16,	76:15, 96:10,
117:17, 124:24,	87:10, 87:17,	39:24, 40:4,	130:25, 137:14,
136:1, 154:1,	87:21, 90:4,	40:7, 41:12,	145:21, 145:24,
154:7, 154:16,	130:18, 131:17,	44:5, 44:8,	146:3, 146:14
154:17, 154:20,	132:13, 135:10,	46:8, 46:9,	afterwards
158:1, 166:5,	136:5, 136:7,	48:1, 48:9,	13:3
167:1, 170:23,	136:14, 138:8,	57:21, 62:17,	again
172:24, 180:22,	138:9, 144:1,	63:4, 63:9,	18:19, 22:23,
180:23, 183:23	144:2, 176:4	74:9, 74:17,	23:13, 79:14,
above	acknowledged	89:14, 90:6,	92:17, 94:20,
14:5, 187:3	167:15	90:8, 90:16,	95:13, 104:6,
above-styled	acquired	90:21, 91:5,	104:22, 113:11,
1:40	49:8, 145:9	91:6, 92:24,	126:17, 143:19,
absolutely	across	145:11, 145:15,	148:12, 174:21,
36:17, 82:12,	133:11	145:17, 182:16,	184:1
114:16	acting	183:22, 184:3	against
access	106:1	addressed	88:13
125:21	action	78:18	age
accord	1:12, 1:25,	addresses	52:18
14:7	188:12, 188:25,	48:16	agent
accordance	189:16, 189:18	adopted	102:9
14:7	active	147:13, 147:20,	agm't
account	80:7, 81:25,	151:8, 176:19	3:28, 3:29
3:39, 49:16,	86:9, 86:16	advance	ago
49:19, 49:23,	actively	65:6	16:17, 45:11,
49:25, 50:3,	86:20	advised	56:16, 56:17,
	activities	114:20, 114:24,	160:17, 161:12,
	53:6	114:25	161:15, 162:21,

Transcript of Angela Svonavec
Conducted on November 4, 2024

191

162:23, 163:18, 172:12 agree 18:13, 20:9, 22:14, 33:2, 34:9, 36:16, 91:10, 95:24, 117:15, 167:16, 177:4, 180:11 agreement 3:30, 3:32, 3:33, 3:34, 112:24, 113:1, 113:6, 115:4, 117:19, 144:24, 147:13, 147:20, 151:11, 151:12, 151:17, 151:22, 152:9, 152:19, 152:21, 153:15, 153:24, 157:3, 157:9, 160:16, 166:14, 167:19, 168:4, 168:11, 168:16, 169:9, 169:25, 170:8, 170:17, 171:2, 171:8, 171:10, 171:16, 173:6, 173:8, 174:10, 174:11, 174:12, 175:13, 175:20, 175:25, 176:6, 176:18, 176:23, 177:9 agreements 41:19, 113:12, 147:4, 151:6 ahead 20:8, 22:8, 27:3, 28:14, 144:23, 152:4, 152:7 aircraft 139:23 airplane 110:9, 110:14 airport 129:18	alabama 7:9 alleged 183:21 allegheeny 165:4 alliance 3:23, 85:11, 85:17, 85:23, 86:7 allocated 122:25, 179:24, 180:8, 183:14 allot 181:11 almost 85:22, 130:2 already 25:20 also 2:17, 7:12, 27:17, 36:24, 38:4, 44:4, 68:24, 111:1, 112:11, 112:21, 120:3, 142:24, 159:15, 171:2, 176:17, 176:19 although 104:7 always 32:8, 61:14, 72:17, 123:21 amended 3:34, 19:20, 176:17, 176:23, 177:8 amendment 3:27 among 14:24, 107:2, 107:10 amount 9:22, 112:8, 113:10, 121:1, 121:5, 179:11 angela 1:34, 1:38,	3:4, 4:5, 5:2, 5:18, 5:20, 18:10, 18:19, 19:14, 22:24, 23:14, 65:25, 66:19, 70:20, 71:19, 74:5, 74:8, 89:14, 89:20, 91:11, 103:21, 112:21, 133:18, 152:17, 153:16, 154:8, 159:8, 162:16, 177:23, 184:16, 186:2, 187:1, 187:6, 188:33, 188:38 angela's 3:28, 147:4, 148:5, 148:9, 148:12, 148:13, 148:20, 148:23, 149:3, 149:11, 149:24, 150:1, 150:3, 150:6, 150:13, 150:23, 151:7, 151:10, 151:11, 171:3, 171:15, 171:18, 173:1, 177:9 angie 132:7 annual 148:20, 148:24, 149:2, 149:10, 149:20 another 26:16, 35:21, 70:5, 111:2, 123:25 answer 6:10, 20:6, 32:22, 35:9, 46:22, 50:13, 50:16, 68:9, 69:6, 69:13, 69:22, 73:19, 78:2, 79:3,	79:20, 79:21, 80:2, 81:1, 81:9, 82:5, 82:7, 82:11, 82:14, 83:9, 83:15, 84:20, 84:21, 85:14, 90:20, 102:6, 116:21, 123:6, 124:3, 139:13, 147:25, 148:1, 149:13, 152:1, 152:4, 156:19, 158:21, 164:1, 164:23, 165:25, 168:21, 169:11, 172:2, 172:4, 179:19, 181:25, 182:25 answered 67:13, 156:17, 161:19, 163:1, 163:25, 168:17 answers 39:4 any 5:25, 6:23, 7:20, 12:9, 19:24, 20:20, 38:19, 40:24, 43:21, 44:2, 44:20, 46:17, 46:20, 47:20, 48:8, 48:12, 50:20, 53:8, 55:4, 68:18, 69:3, 69:10, 69:17, 73:21, 74:16, 77:23, 86:1, 93:11, 94:4, 97:1, 97:3, 97:18, 97:25, 105:3, 105:24, 111:13, 121:15, 123:6, 123:11, 123:22, 126:6, 127:20, 129:2, 136:8,
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Transcript of Angela Svonavec
Conducted on November 4, 2024

192

137:4, 138:14, 138:16, 142:18, 143:20, 144:3, 145:19, 145:23, 146:12, 147:17, 149:23, 150:2, 150:9, 150:12, 150:18, 155:20, 166:25, 167:24, 168:23, 174:25, 175:12, 178:18, 180:6, 181:14, 181:23, 182:7, 182:14, 183:13, 189:10, 189:15 anybody 37:11, 38:10, 38:12, 66:9 anymore 39:3, 50:6, 55:2, 57:6 anything 5:13, 46:25, 71:15, 78:4, 85:2, 87:9, 90:12, 93:24, 113:11, 116:14, 117:10, 131:7, 134:24, 136:2, 146:3, 146:5, 154:3, 154:7, 154:20, 155:8, 155:9, 155:23, 157:25, 167:6, 168:3, 168:9, 168:13, 169:5, 169:18, 169:19, 172:23, 181:22, 181:24, 183:8 anywhere 32:4, 60:25, 68:15, 80:7 apart 103:13 apologies 178:12 apologize 158:25, 160:5	appeals 106:20 appearances 3:3 appears 33:8, 88:17, 129:3 appointments 134:16 appoints 177:23 approximately 31:22 april 53:20 area 43:6, 58:7, 75:12, 83:4, 111:22 around 8:8, 8:9, 11:21, 13:5, 16:7, 27:2, 27:4, 59:6, 76:11, 171:13 arrangement 9:18, 9:21, 10:12, 10:16, 52:5 article 3:17, 3:18, 3:20, 63:18, 64:15, 65:6, 65:13, 65:25, 66:15, 66:17, 67:8, 70:19, 74:25, 75:20, 76:21, 76:24, 77:13, 77:17 articles 72:14 ashrams 7:9 aside 15:19, 25:13, 72:19, 93:8, 176:3 asked 31:3, 49:12,	67:12, 67:15, 75:23, 76:3, 78:4, 111:13, 111:15, 136:1, 156:17, 160:6, 161:18, 163:1, 163:25, 168:17, 168:25 asking 51:2, 100:14, 114:6, 115:9, 119:18, 119:19, 123:22, 135:24, 146:2, 146:4, 146:11, 150:16, 150:17, 150:22, 154:16, 156:13, 158:6, 158:16, 158:23, 159:11, 164:5, 165:17, 179:18 asks 29:16 assign 157:20 assigned 157:13, 157:19, 166:19, 170:20, 171:14, 177:7, 177:10 assignee 158:5, 159:12 assigning 157:3 assignment 3:30, 3:32, 157:3, 157:8, 158:1, 166:14, 167:8, 171:10, 171:16, 172:25, 173:6, 173:8, 174:9, 176:6 assignor 158:5, 159:12 associate 127:3 associates 2:4, 4:18,	74:1, 126:23 assume 20:17, 60:5, 88:18, 99:24, 136:13, 152:10 assumed 11:16, 20:23, 77:10, 132:10 atc 3:26, 3:43, 128:22, 132:1 attached 1:46, 160:10, 189:9 attend 52:2, 84:12, 86:3, 148:25 attended 55:6, 85:17, 86:8, 148:24 attending 59:10, 150:17 attends 85:22 attention 14:18, 21:9, 24:11, 34:22, 70:18, 89:18, 101:13, 103:19, 160:9, 175:8 attorney 97:4, 124:1, 125:20, 146:7, 148:25, 157:17, 166:21, 166:22, 166:25, 167:4, 169:13, 170:4, 170:21, 171:21, 171:25, 172:6, 176:11 attorneys 14:10, 33:23, 34:8, 74:1, 98:21, 106:21, 107:2, 113:12, 113:15, 114:4, 114:5, 114:20, 114:21, 128:19,
----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Transcript of Angela Svonavec
Conducted on November 4, 2024

193

131:12, 148:8, 160:1, 160:8, 169:21, 172:12, 180:21 attributable 122:14 attributed 122:19 attributes 79:5 auction 43:4, 43:7, 43:9, 43:20, 126:22, 127:6, 132:23 auctioneers 43:20 auctions 43:1, 127:5, 132:23, 141:21, 141:22, 142:11, 142:12 audit 106:11 august 53:14, 54:6, 144:14, 144:17, 145:4, 147:14, 147:17, 151:8, 157:9, 170:13, 170:16, 175:21, 175:25, 176:7, 177:5, 177:7 australasion 7:11 author 64:14, 65:18, 77:7, 77:25 authorities 89:25 authorize 106:7 authorized 15:8, 106:10 avenue 2:13 average 31:19	aviation 46:16, 128:21, 128:25, 135:4, 136:21 aware 47:24, 50:11, 50:22, 72:2, 99:22, 131:15, 137:4, 145:19, 145:23, 146:3, 146:5, 146:12, 175:12, 178:18, 179:6 ayso 53:11	bahamas 7:9 bal 26:6 ban 48:21 bandit 47:21 bank 3:14, 33:14, 33:20, 49:16, 49:17 bans 34:5, 94:7 banshee 1:19, 3:35, 4:6, 34:15, 36:23, 39:2, 39:6, 39:7, 39:8, 39:21, 39:25, 40:4, 40:7, 40:13, 40:14, 41:2, 41:3, 41:18, 41:25, 44:18, 45:8, 45:9, 45:12, 45:13, 45:21, 46:1, 47:7, 47:12, 47:13, 49:1, 49:10, 76:5, 112:22, 120:3, 120:24, 121:1, 121:5, 121:22, 122:24, 123:9, 144:10, 144:20, 145:12, 145:15, 145:21, 146:4, 157:4, 157:13, 160:3, 160:7, 166:14, 166:18, 170:20, 171:4, 171:14, 176:18, 176:24, 177:6, 177:9, 178:1, 178:17, 179:5, 179:14, 179:20, 180:8, 180:11,	180:14, 180:23, 181:13, 181:21, 181:23, 182:7, 182:20, 183:4, 183:7, 183:11, 183:23, 183:25, 184:1, 188:19 banshee's 183:17, 183:19, 183:22 bar 114:15 based 43:2, 143:23 basically 63:2, 63:23, 176:10 basis 69:17, 136:8, 138:14, 138:16 bates 34:1, 34:3 bathroom 174:21 beagle 33:22, 36:5, 36:14, 36:20, 36:22, 37:1, 37:13, 38:4, 38:23, 40:10, 41:12, 44:5, 44:8, 44:21, 45:5, 46:8, 48:1, 48:9, 48:11, 49:13, 62:17, 63:6, 145:12, 183:17, 183:22, 184:3 bear 132:7 bearing 88:18 because 11:5, 16:10, 32:1, 32:25, 44:18, 52:15, 54:22, 60:8, 60:13, 61:3,
B			
	back 8:12, 15:21, 16:5, 28:23, 28:24, 33:1, 37:12, 44:6, 56:15, 58:21, 79:23, 81:25, 91:23, 95:6, 101:17, 102:18, 104:17, 109:8, 109:22, 115:11, 117:8, 120:7, 124:21, 130:4, 130:7, 130:11, 130:21, 130:23, 131:7, 131:8, 131:18, 134:2, 134:4, 134:7, 136:19, 140:19, 140:23, 143:6, 143:9, 143:16, 148:3, 153:1, 154:21, 155:24, 162:9, 168:19, 172:2, 175:5, 175:8, 176:10, 180:20 backyard 72:17 bag 179:2		

Transcript of Angela Svonavec
Conducted on November 4, 2024

194

66:10, 72:5, 72:15, 72:17, 74:13, 76:15, 77:10, 77:22, 84:4, 94:13, 96:11, 101:5, 110:16, 127:5, 128:5, 130:19, 130:22, 132:13, 133:5, 133:25, 134:11, 134:22, 135:12, 136:5, 136:11, 136:14, 138:15, 139:12, 140:12, 141:1, 142:4, 147:19, 149:7, 152:18, 152:24, 154:17, 159:20, 161:13, 164:7, 164:9, 165:14, 166:7, 168:5, 177:6, 180:2, 181:1, 181:9 become 109:10 bedroom 61:6, 61:12 beef 45:17 been 5:3, 11:9, 11:24, 16:8, 16:13, 28:25, 29:2, 30:15, 31:14, 51:3, 53:17, 53:21, 54:6, 57:22, 57:25, 68:14, 76:16, 85:18, 86:8, 86:13, 86:16, 88:1, 88:4, 115:24, 121:12, 121:13, 122:5, 126:16, 126:24, 132:8, 132:24, 132:25, 133:7, 133:16,	137:6, 137:7, 141:14, 141:17, 141:18, 141:19, 143:10, 143:14, 147:13, 149:10, 156:6, 157:17, 162:8, 162:14, 163:12, 177:5, 178:16, 179:13, 179:18, 179:20, 179:24, 180:8, 188:41 before 1:42, 7:13, 8:7, 8:23, 15:8, 17:17, 21:10, 24:9, 25:24, 27:21, 29:7, 30:13, 34:19, 34:25, 45:18, 58:1, 62:6, 70:15, 73:20, 77:17, 77:19, 81:11, 82:23, 85:8, 100:21, 106:17, 112:14, 120:10, 139:19, 153:2, 160:25, 162:15, 164:20, 164:21, 176:17, 177:10, 189:7, 189:13 begin 58:25 beginning 148:3 begins 4:4 behalf 72:23, 73:22, 83:3, 83:12, 106:2, 145:21, 146:4, 153:10, 154:12, 155:21, 158:4, 160:24, 161:3, 161:9, 161:16 being 12:10, 23:22,	38:16, 38:19, 40:18, 70:17, 75:20, 90:13, 102:2, 120:18, 171:17, 176:10 belief 89:22, 91:13 believe 19:24, 24:3, 26:3, 26:12, 26:23, 27:2, 27:4, 27:17, 29:8, 30:4, 31:3, 38:4, 38:24, 40:1, 41:14, 44:4, 47:1, 47:6, 49:14, 51:10, 52:12, 52:13, 69:23, 71:7, 71:8, 79:9, 79:17, 80:8, 81:17, 88:23, 92:7, 95:16, 96:3, 96:9, 96:12, 108:10, 125:18, 126:12, 136:14, 175:11, 176:9, 179:15, 179:16 believes 83:1 belong 50:20 below 25:3, 89:18 benefit 68:1 besides 48:11 best 5:14, 8:6, 28:12, 28:16, 29:4, 79:6, 89:22, 91:12 bet 8:10 between 50:7, 54:4,	60:25, 95:25, 112:24, 117:19, 125:25, 126:5, 127:19, 140:13, 141:4, 171:3, 171:18, 173:8, 174:11 big 81:23, 158:13 birth 5:19 bissoon 3:21, 78:15, 78:19, 78:24, 81:6 bit 17:17, 32:12, 35:19, 48:15 black 102:20 blood 174:25 blossom 54:24 blur 127:1 board 64:1, 64:3, 64:18 boat 28:3 bolded 19:3, 21:16, 24:17, 24:18, 25:7, 25:8 bona 15:1 books 108:14, 108:20, 108:25, 109:17, 110:7, 110:13, 116:25, 119:23, 121:17, 148:6, 148:14, 148:18, 150:4 born 5:21, 9:11, 9:13, 9:14,
----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Transcript of Angela Svonavec
Conducted on November 4, 2024

195

10:24, 11:1, 11:2, 11:4, 11:5, 51:11, 55:21, 71:23 both 4:19, 4:21, 86:19, 111:1, 145:6, 151:6, 170:12, 184:4, 184:6, 184:7 bottom 34:2, 94:8, 101:13, 144:15, 152:16 bought 25:23, 25:24, 26:2, 26:3, 27:1, 28:10, 30:19, 35:16, 56:15, 62:21, 144:25 bound 167:16 bowling 142:19 box 145:18 boy 126:21, 128:12 brain 11:6 branch 50:7 break 51:4, 51:6, 58:17, 124:14, 174:21, 181:11 breaks 44:25 brief 58:17 broad 80:18 brodman 106:21 brothers 43:2, 43:16 build 11:20, 27:10,	65:16 building 37:3, 59:19 buildings 37:4, 37:15, 37:18 built 12:13, 16:5, 17:10, 30:13, 30:20, 32:17 burkett 87:4, 87:6, 87:8, 87:15 business 41:1, 42:4, 44:15, 45:6, 45:13, 46:13, 58:9, 58:10, 68:15, 68:18, 68:21, 75:25, 80:6, 104:21, 105:24, 106:3, 107:3, 107:11, 107:14, 108:1, 108:10, 112:23, 117:21, 117:24, 118:3, 126:22, 127:3, 180:15, 182:5, 182:22, 183:1 businesses 6:15, 36:24, 38:6, 38:22, 63:8, 68:14, 68:17, 69:14, 69:16, 76:1, 79:15, 112:4, 150:21 buy 42:17, 42:20 <hr/> C <hr/> calendar 127:18, 127:22 call 34:2, 34:3, 75:21, 75:22, 95:17, 100:8,	125:7, 173:19 called 47:7, 47:12, 47:13, 47:21, 135:4, 155:21 calling 152:5, 182:5 cambria 75:13, 75:14 came 8:12, 16:5, 26:6, 59:22, 63:2, 83:25, 130:11, 131:8, 132:21, 135:18, 139:5, 140:19, 162:18, 163:5, 177:12 can't 10:8, 16:4, 16:15, 62:19, 63:2, 103:9, 103:10, 123:15, 123:19, 126:24, 127:16, 128:12, 129:12, 133:22, 139:23, 140:25, 141:19, 141:23, 142:21, 152:18, 153:21, 155:9, 156:10, 175:15 cannot 162:23, 183:9 capacity 11:22, 12:23 capital 3:14, 19:3 capitalized 21:16, 24:17, 24:18, 24:19, 25:7, 25:8 card 184:21, 184:23 care 69:4 career 54:11, 54:12 carry 65:15	case 4:9, 33:24, 82:21, 83:2, 83:7, 89:9, 90:10, 160:2, 160:8, 184:11 cases 4:19, 5:9 casey 6:4 cash 35:16 cat 43:22, 43:24, 43:25 cattle 45:17 cause 1:41 caused 112:7, 117:5, 120:3 cautioned 188:41 cdls 7:13 cell 58:4, 58:13 center 2:12 certain 52:18, 111:5, 129:8 certificate 3:8, 3:27 certification 188:32 certified 38:2, 188:36 certify 188:37, 189:4, 189:14 cetera 77:6 chadd 2:3, 4:17, 13:12, 27:6, 50:14
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Transcript of Angela Svonavec
Conducted on November 4, 2024

196

chance 58:3 change 52:10, 186:4 changed 11:15, 25:15, 45:11, 52:8, 52:12, 144:20, 145:1, 145:10 changes 3:7, 119:14, 186:1, 189:9, 189:10 changing 144:9 chapel 142:20 character 83:11, 83:21, 84:9, 84:17 characterized 100:15 characterizing 88:19, 100:19, 100:20, 181:2 charters 125:11, 125:12, 125:13 check 28:19, 96:10, 163:16, 182:15 checking 3:39, 50:3, 50:10 checklist 29:11 checks 20:18, 155:6 child 9:8, 10:19 choose 97:1 choosing 97:13 chosen 95:21 christmas 131:6, 134:1	church 3:23, 85:11, 85:17, 85:19, 85:20, 85:23, 86:2, 86:3, 86:7, 86:8, 86:15, 86:19, 86:22, 87:6, 87:13 churches 86:4 city 111:22 civil 1:12, 1:25, 1:45, 3:24, 88:12, 89:11, 90:3, 90:15, 188:12, 188:25 claim 33:11, 71:11 claimed 120:15, 120:18, 120:23, 122:12, 122:16 claiming 90:11 clarendon 12:18, 12:21, 12:25, 13:4, 57:22, 61:20, 62:3, 62:22, 63:5 clarified 91:14 clarify 29:19, 84:15, 155:15, 159:1, 165:19 clarifying 61:17, 89:1, 158:15 clayton 7:8 clean 165:20 clear 20:7, 71:14,	84:20, 88:21, 133:1, 166:10, 178:12 clerk 14:4 close 103:13, 155:1 closed 11:5 closing 27:10, 76:11 club 50:25 clubs 50:21 co-industries 66:10 co-own 12:7, 12:9 co-owned 30:1 co-owner 30:22 coaching 181:4 coal 1:27, 4:7, 37:22, 41:4, 68:21, 73:2, 76:4, 76:18, 80:17, 80:18, 80:19, 80:20, 80:22, 81:3, 81:7, 81:22, 117:20, 117:22, 144:10, 144:20, 144:25, 145:7, 180:24, 188:27 coast 26:5, 26:14, 28:4 code 58:7, 89:24, 119:17, 119:19 cold 72:17 collected 44:12	collection 92:9 collective 18:2 collects 92:4 college 7:8, 7:11, 55:5, 55:6 column 19:18, 21:9, 94:21, 133:12 come 54:23, 72:16, 84:2, 130:13, 130:20, 131:1, 143:16, 162:19, 182:8 comes 31:18, 31:22, 99:12, 99:14, 130:4 coming 65:6, 130:5 commenced 4:3 commercial 128:6, 128:7 committee 3:17, 3:18, 63:18, 63:21, 64:4, 64:19, 64:24, 69:10, 70:6, 70:15, 71:21 commonwealth 73:13, 73:22, 144:8, 145:20, 167:7, 172:24 communication 102:8 communications 114:6, 166:25, 167:1 communities 67:2, 68:17, 68:23, 69:1, 69:4, 79:14
---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Transcript of Angela Svonavec
Conducted on November 4, 2024

197

community 66:20, 66:23, 68:4, 69:19, 79:9, 79:12, 79:17, 80:4, 80:7, 80:14, 80:15, 80:16, 80:17, 80:18, 80:19, 80:20, 80:23, 81:4, 81:6, 81:7, 81:10, 81:12, 81:13, 81:16, 81:18, 81:20, 81:21, 81:24, 82:1, 82:3, 82:7, 82:8, 86:9, 86:17, 86:19, 86:21, 86:23 companies 41:17, 41:22, 48:8, 66:19, 67:1, 68:22, 68:24, 123:11, 123:13, 123:23, 157:18, 181:10, 183:5 company 1:7, 1:21, 46:14, 46:15, 47:7, 47:10, 47:11, 47:17, 47:21, 47:25, 48:3, 48:21, 56:15, 58:12, 72:24, 74:5, 76:4, 104:19, 105:11, 107:20, 107:21, 107:25, 108:18, 109:1, 114:23, 116:11, 122:18, 123:9, 145:1, 150:5, 177:24, 178:7, 178:16, 180:18, 182:1, 182:11, 188:7, 188:21	company's 124:25 compare 173:9 compensated 117:21, 117:23 compensation 178:5, 178:14, 179:8, 179:10, 179:24 compilation 3:13, 91:24 complaint 3:24, 40:6, 88:12, 89:11, 89:15, 89:21, 90:3, 90:15, 90:21, 91:1, 91:12, 91:21, 91:22 complete 5:14, 63:23, 142:4 completed 64:1, 137:7 completely 44:17, 106:11 completion 189:7, 189:13 computer 72:6, 154:18 concluded 185:2 concludes 184:8 conclusive 154:14, 154:16 conemaugh 9:14 conferences 53:4 conformity 14:2, 14:7 confuse 145:8 confused 116:13 confusing 125:3	confusion 145:2, 166:8 connection 66:14, 72:13, 78:15, 82:20, 87:9, 87:16 consideration 167:14, 167:18, 167:24, 168:1, 168:15, 169:19 consistent 27:8, 71:8 construction 12:15 consultants 128:25, 135:5, 136:21 contain 14:23 contains 189:10 contend 103:21, 104:11, 104:18, 105:2, 112:22 contended 104:2, 105:3 context 110:24, 111:1, 111:2, 137:18, 155:14, 161:24 continue 17:7, 30:7 continued 17:18, 99:4, 99:18 continuously 11:9 contradictory 3:43 contradicts 136:11 contribution 3:33, 66:20, 171:2, 173:1 control 136:21 conversation 97:13	convinced 107:7 copies 101:4 copy 3:40, 58:2, 63:16, 184:20 corn 37:22 corner 88:25 corporate 34:12, 148:6, 148:14, 148:18 corporations 124:6, 147:8 correct 10:20, 12:3, 13:23, 15:18, 15:25, 19:11, 20:9, 20:23, 21:24, 22:24, 22:25, 24:22, 25:11, 25:12, 25:21, 26:1, 29:6, 29:24, 30:2, 30:17, 31:1, 31:6, 37:17, 38:7, 39:23, 51:25, 55:15, 57:16, 58:6, 58:9, 59:14, 59:24, 60:7, 61:21, 64:9, 70:12, 70:25, 71:6, 71:13, 73:3, 73:13, 73:14, 74:1, 74:10, 75:4, 79:1, 83:19, 83:20, 83:22, 83:23, 89:12, 89:16, 89:21, 91:2, 91:3, 91:12, 91:19, 92:15, 92:24, 96:1, 96:11, 98:2,
----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Transcript of Angela Svonavec
Conducted on November 4, 2024

198

98:4, 109:6, 110:20, 115:16, 133:22, 137:1, 137:19, 137:20, 140:14, 141:7, 148:10, 154:2, 159:9, 163:3, 164:18, 164:21, 164:24, 165:5, 169:21, 174:1, 178:3, 187:3 correcting 11:7 correctly 20:24 correspondence 40:3 corroborate 143:20, 144:3 could 22:19, 23:12, 32:4, 36:16, 37:8, 60:23, 65:12, 69:7, 70:18, 75:25, 76:20, 79:6, 79:23, 86:22, 86:23, 89:18, 90:25, 91:23, 102:18, 103:19, 106:12, 109:22, 112:13, 133:23, 135:24, 152:12, 156:9, 159:13, 162:8, 175:7 couldn't 152:3, 177:8 counsel 4:15, 133:14, 136:16, 189:14 count 28:24, 143:24, 181:9 counties 68:13 country 50:20 county 5:23, 5:25,	6:12, 66:1, 68:11, 68:20, 69:18, 70:21, 71:20, 71:22, 71:24, 75:12, 75:13, 81:15, 83:1, 84:4, 84:7, 165:4 couple 35:1, 92:21 course 184:10 courses 7:12 court 1:1, 4:8, 4:22, 52:11, 52:12, 87:9, 87:16, 90:16, 188:1 crane 45:9, 47:8, 47:13, 47:16, 112:22 crc 1:42 crimes 89:24 criminal 82:21 crr 1:42 csr 1:42, 189:24 cumberland 3:17, 3:18, 63:18, 63:20, 64:3, 64:19, 69:9, 69:18, 70:6, 70:15, 71:21 current 35:2, 126:2 currently 12:17, 12:18, 56:9, 61:19, 123:11, 123:22 curt 4:20, 5:8	curtis 2:10 custody 9:18, 9:21, 9:22, 9:23, 9:24, 10:2, 10:11, 52:4 customers 42:18, 182:7, 182:8, 182:12, 182:13, 182:19 cyber 60:2, 60:4, 60:7, 60:14, 60:18, 60:20, 60:21 <hr/> D <hr/> dad 51:21 data 129:2, 142:4 date 4:10, 13:22, 25:22, 35:2, 62:13, 64:8, 71:5, 88:18, 88:24, 89:3, 129:16, 132:22, 143:17, 144:15, 145:21, 145:24, 146:4, 169:25, 176:12, 186:3, 189:8, 189:25 dated 33:19, 70:8, 74:25, 161:11, 176:10 dates 3:42, 126:21, 127:17, 143:23 daughter 52:23 day 6:16, 44:24, 83:17, 130:23, 130:25, 131:2, 131:6, 131:8,	147:13, 147:21, 151:8, 162:16, 164:20, 170:1, 171:14, 171:19, 176:1 days 133:8, 143:25, 162:23, 189:8 deal 50:8, 91:25, 129:1 dealer 43:22, 43:24, 43:25 deals 43:23 deceased 21:20 december 129:22, 130:3, 131:6, 132:20 decided 28:20 decision 97:22, 113:14, 113:25, 114:13, 157:16, 157:20, 167:1, 170:4, 172:21 decisions 114:22, 123:7, 180:21 declaration 3:11, 13:19, 13:25, 14:6, 14:24, 14:25, 15:15, 15:16, 15:22, 15:23, 16:19, 17:19, 17:22, 29:23, 31:5 deducted 108:13, 110:7, 110:12, 116:25, 119:21, 121:16 deductible 122:10 deduction 33:12, 109:16,
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Transcript of Angela Svonavec
Conducted on November 4, 2024

199

122:5 deductions 120:1 deed 3:16, 12:8, 12:10, 26:22, 28:17, 62:3, 62:16, 63:5 deeded 49:3 deep 66:1, 66:5 defendant 1:15, 1:30, 1:39, 34:11, 82:25, 188:15, 188:30 defendants 2:9, 4:21, 5:9 definitely 66:5, 75:6, 76:13, 93:13, 96:25, 98:19, 99:16, 100:12, 146:6, 158:10 definition 20:12 delaware 46:10, 46:11, 107:21, 116:11, 118:25 delivered 44:11 democrat 3:20, 74:25, 75:3 demonstrate 68:23 deny 158:9 department 56:25, 57:10, 73:23, 144:9, 145:20 depiction 136:7 deponent 189:5, 189:6,	189:12 depos 4:12, 4:24 deposition 1:33, 1:38, 4:3, 4:5, 4:13, 13:14, 14:12, 18:3, 33:6, 50:16, 56:20, 61:22, 63:13, 70:1, 72:21, 74:22, 78:12, 82:17, 85:3, 88:10, 101:2, 124:10, 144:5, 146:17, 146:24, 157:1, 159:23, 166:1, 170:24, 174:17, 184:9, 184:11, 184:16, 185:2, 186:3, 187:2, 188:33, 188:38, 189:7, 189:13 desantis 28:24, 29:1 describe 79:5 description 3:10, 3:37 designation 169:24 desire 66:18 details 136:12 determined 112:12, 179:12 died 131:8 difference 12:9, 95:24 different 31:9, 41:21, 43:12, 44:19, 44:24, 52:22, 67:15, 69:15, 85:1, 97:14,	97:15, 116:15, 149:7, 150:11, 164:2, 164:3, 164:4, 168:24, 173:13, 174:3 difficult 32:25 diploma 59:25, 60:4 direct 21:8, 24:10, 34:21, 70:18, 76:24, 89:18, 93:13, 101:12, 103:19, 160:9, 175:8, 183:2 direction 166:21, 189:3 directly 43:23, 66:11 disclosing 166:24 discoverable 137:23 discussed 23:4, 65:2, 97:8, 97:9, 145:4, 145:5, 149:8, 149:16 discussion 97:3, 97:17, 97:25, 111:2 discussions 157:23 display 87:12 dispute 135:18, 153:16 disputed 120:18, 139:13 distance 31:16 distinction 50:4 district 1:1, 1:2, 4:8, 82:20, 188:1, 188:2	diverse 7:5 divorce 9:25 divorced 9:16 doc 129:7 dock 26:17 doctorate 7:7 document 3:43, 13:17, 22:16, 22:20, 33:7, 33:17, 34:19, 35:23, 36:2, 36:19, 73:5, 73:10, 73:12, 73:17, 73:25, 82:25, 101:5, 101:6, 101:12, 101:21, 128:16, 128:17, 129:7, 132:6, 134:19, 134:21, 135:4, 136:10, 136:13, 137:13, 137:15, 138:7, 139:4, 139:8, 139:14, 140:11, 140:23, 143:5, 143:24, 144:7, 145:11, 152:13, 153:2, 153:10, 154:12, 159:4, 159:12, 176:22, 178:5 documentation 3:41, 60:12 documented 29:20, 134:12, 134:13, 134:14 documents 3:36, 33:23, 34:10, 137:23, 146:19, 153:22, 154:25, 155:2,
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Transcript of Angela Svonavec
Conducted on November 4, 2024

200

155:4, 173:10, 173:11 docusign 20:18, 98:9, 153:14, 170:11, 170:15, 171:7, 173:16, 175:19, 176:21 doing 69:4, 69:10, 75:24, 98:11, 99:24 domicile 3:11, 13:19, 14:15, 15:15, 15:22, 17:20, 17:23, 26:8, 29:23, 31:5 donated 87:13 donations 86:14 done 38:17, 38:19, 45:2, 45:5, 45:7, 66:10, 116:19, 124:5, 171:21, 171:23, 172:8, 172:13, 181:19, 183:5 double 101:4 down 18:21, 25:25, 27:23, 32:5, 35:1, 43:22, 44:25, 69:14, 76:23, 77:2, 94:22, 95:13, 111:12, 125:11, 126:19, 126:23, 132:21, 163:14, 163:21, 167:13, 172:14, 181:2 dozen 54:12, 123:18 drive 6:18, 12:19,	12:21, 12:25, 13:2, 13:4, 30:3, 57:22, 61:20, 62:4, 62:22, 62:23, 63:5, 63:7, 66:18, 126:11, 128:3 driver's 27:14, 27:19, 27:22, 28:1, 28:22, 54:14, 54:19, 55:1, 55:11, 55:14, 55:19, 56:14 dropbox 154:4, 154:5 duly 1:40, 5:3, 188:41 duquesne 55:6 during 9:3, 11:12, 32:17, 127:5 <hr/> E <hr/> e-tran 185:1 each 66:19, 92:1, 94:14, 138:24, 147:12, 150:5 earlier 26:3, 31:3, 51:10, 52:4, 53:23, 55:21, 58:23, 92:2, 93:16, 102:19, 111:13, 124:23, 175:11, 180:23 early 56:17 earned 122:17 east 4:14 easy 109:24	education 6:23 effect 98:3 effective 157:9, 170:1, 170:2, 170:17, 171:2, 171:9, 175:13, 175:25, 176:6, 176:9, 176:12 effort 63:22, 87:21 eight 29:1, 77:6, 124:5 either 49:4, 51:8, 107:21, 131:22, 153:8, 161:5, 172:24, 174:10 election 28:23, 179:10 elections 28:24 electronically 154:2 electronics 154:18 elementary 59:16 eligible 54:22 else 6:14, 46:25, 68:12, 71:15, 116:17, 130:4, 155:8, 169:11, 182:23 embarrassed 11:3 employed 189:15 employee 181:19 employees 39:7, 39:8, 39:13, 39:20,	41:16, 41:18, 41:21, 41:25, 44:18, 77:6, 181:16, 183:3 enabled 106:4, 107:4, 107:12, 107:16, 108:2 end 51:20, 52:21, 53:21, 55:25, 56:6, 61:11, 62:15, 79:8, 103:8, 106:14, 109:23, 109:24, 114:19, 120:8, 170:12, 181:12, 184:16 ended 171:19 ends 101:13, 103:16 enforcement 83:3 enough 154:17, 166:11 enrolled 60:18 entire 54:12, 76:21, 92:12 entirely 34:13, 34:14, 113:13 entities 147:25 entitled 179:10 entity 145:9 entity's 110:9 entry 143:5, 143:10, 152:16 equipment 42:6, 42:17, 42:21, 42:23,
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Transcript of Angela Svonavec
Conducted on November 4, 2024

201

<p>43:9, 43:19, 44:25, 47:21, 81:22, 125:5, 127:6 erection 47:8, 47:16 error 74:19, 78:7, 85:2, 133:23, 133:24, 134:17, 134:19 established 26:7, 63:23, 164:16 et 77:6 ethic 66:2, 66:6 even 89:5, 119:17, 127:22, 129:12, 130:18, 130:25, 132:1, 139:23, 139:24, 153:14, 155:1, 160:25, 176:13 eventually 30:9 ever 11:24, 32:13, 47:23, 53:3, 68:15, 70:17, 97:12, 97:17, 100:15, 102:7, 102:13, 128:3, 128:6, 131:17, 136:1, 148:24, 149:17, 149:21, 150:2 every 6:16, 28:22, 31:20, 31:22, 31:23, 44:24, 72:15, 73:16, 85:22, 87:21, 98:10, 119:14, 126:25, 130:3, 132:6, 142:16,</p>	<p>163:15 everybody 33:1, 44:12, 65:2, 86:20, 130:4 everybody's 164:13, 182:15 everyone 72:5, 81:12 everything 11:17, 20:23, 28:21, 63:10, 78:25, 92:9, 98:9, 99:24, 114:21, 117:15, 124:2, 145:18, 178:24, 180:20, 181:15 everywhere 67:1, 79:15, 80:6, 80:11, 80:13 evidence 134:17, 137:13, 138:3, 143:20, 144:3 evidencing 14:15 evidently 76:14 ex'ing 162:11 ex-husband's 9:1 exact 25:22, 28:16, 62:24, 126:21, 141:24, 143:17 exactly 8:4, 16:15, 17:11, 53:1, 56:13, 98:10 exam 102:9 examination 3:5, 5:4 examiner 3:25, 102:7,</p>	<p>106:2 examiner's 101:7, 101:22, 102:11, 103:25 except 52:6, 83:2, 187:3 excerpt 128:15 excerpts 3:25, 101:6 exchange 167:19, 168:3, 168:11, 169:6 excuse 30:19, 57:17, 85:6, 100:2, 129:23, 152:20, 168:14 execute 174:9 executed 151:12, 170:8, 170:10, 171:8, 175:20, 176:7 exhibit 3:43, 13:10, 13:14, 13:16, 14:11, 14:12, 15:22, 18:2, 18:3, 18:5, 21:1, 25:13, 33:5, 33:6, 56:20, 56:22, 61:22, 62:3, 63:13, 63:15, 64:7, 70:1, 70:3, 70:11, 72:20, 72:21, 74:22, 74:24, 78:12, 78:14, 82:16, 82:17, 85:3, 85:5, 88:9, 88:10, 91:24, 92:4, 101:2, 101:4, 124:10, 124:12, 128:11, 144:5,</p>	<p>144:7, 146:17, 146:24, 151:12, 152:13, 156:3, 156:25, 157:1, 159:23, 159:25, 160:10, 160:11, 160:17, 160:19, 160:20, 160:23, 161:3, 161:8, 161:16, 165:21, 166:1, 166:13, 170:24, 171:1, 173:5, 173:7, 173:12, 174:1, 174:3, 174:6, 174:17, 174:19, 175:8, 176:16, 177:17 exhibits 3:9 expect 73:24, 144:4 expense 116:25, 119:22, 121:17 expenses 108:13, 108:19, 109:15, 109:16, 110:6, 110:12, 120:15, 120:23, 178:7, 178:15, 178:17, 178:19, 178:20, 178:22, 179:5 expiration 189:25 explain 114:17 exposed 129:9, 129:16 expression 100:21 extension 19:19 extent 81:6 extremely 81:25</p>
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Transcript of Angela Svonavec
Conducted on November 4, 2024

202

eyes 128:12, 128:15	49:10, 76:3, 183:23	129:5	14:9, 16:18, 17:19, 17:23, 18:14, 18:19, 21:2, 23:5, 23:8, 73:5, 73:8, 73:10, 73:12, 73:22, 88:13, 88:19, 89:9, 89:11, 90:15, 92:13, 92:18, 93:4, 93:18, 94:2, 94:5, 94:25, 95:1, 95:18, 96:22, 96:23, 97:5, 97:6, 98:5, 98:6, 99:1, 99:4, 99:18, 121:10, 144:8, 144:14, 146:3, 146:13, 157:25, 167:6, 172:23, 173:2
F	farming 45:20, 66:10	fearlesses 125:3	files 144:16
f) (1 189:5	farms 36:23, 45:8, 45:12, 45:14, 45:21, 46:1, 49:10	february 62:13, 64:8, 70:24, 74:25, 76:14, 129:23, 132:22	filing 14:6, 14:19, 17:22, 20:14, 21:2, 21:16, 21:18, 22:2, 23:2, 23:15, 23:16, 25:6, 25:7, 74:4, 88:23, 92:14, 93:3, 93:9, 95:3, 97:5, 97:6, 145:19, 145:24, 160:1, 160:4
f1 125:7, 125:9	father 60:9	fed 162:11	fill 50:16
f2 125:7, 125:10	fax 88:17	federal 1:45, 18:14, 21:1, 22:21, 23:6, 24:4, 92:13, 92:20, 92:22, 93:3, 93:9, 96:21, 97:5, 97:13	final 21:20, 95:2, 175:8
fact 133:17	fear 125:2	fee 117:6, 118:7, 118:10, 118:14, 119:22, 121:22, 179:14, 180:8, 183:14	financially 189:17
facts 89:20, 91:1, 91:11, 91:15, 91:21, 91:22, 119:18	fearless 38:25, 41:9, 41:15, 42:1, 42:5, 42:6, 42:7, 42:10, 42:16, 44:4, 44:7, 45:24, 46:7, 46:9, 46:13, 47:2, 47:5, 101:21, 103:22, 104:4, 104:12, 104:23, 105:4, 105:12, 105:16, 105:21, 107:13, 108:14, 108:20, 109:5, 109:10, 109:16, 110:8, 110:13, 112:7, 112:22, 112:24, 113:9, 114:12, 115:1, 115:5, 115:13, 115:19, 116:24, 117:5, 117:20, 117:21, 117:24, 118:4, 119:21, 121:16, 121:23, 122:5, 123:3, 123:10, 124:24, 125:1, 125:4, 125:5, 125:7, 125:8, 125:15, 126:6, 129:4,	feel 53:11, 68:19, 76:20, 96:9, 101:11, 120:16	financing 3:19, 72:23
fair 16:20, 20:21, 51:13, 61:1, 73:15, 75:11, 78:24, 85:16, 101:1, 166:11, 180:1		feels 182:4	
fall 53:13		feet 31:24	
falsification 89:25		few 10:7, 51:4, 53:9, 54:9, 55:9, 141:14	
familiar 33:20, 95:20, 95:23, 98:22		fide 15:1	
familiarity 87:15		fifth 59:6	
family 6:15, 80:6, 86:7, 86:16		file 24:4, 31:4, 96:21, 97:22, 98:7, 99:4, 99:18, 137:14, 145:25	
far 104:17, 115:11		filed 13:20, 13:25,	
farm 11:19, 11:20, 36:23, 37:1, 37:2, 37:13, 38:13, 38:16, 45:5, 45:7, 45:8, 45:9, 45:10, 45:15, 45:16, 47:12, 47:13, 49:7,			

Transcript of Angela Svonavec
Conducted on November 4, 2024

203

find 12:1, 102:23 fine 34:17, 48:19, 51:8, 71:10, 101:1, 146:10, 181:7 finish 20:6, 152:20 firm 162:2, 162:4, 162:13, 162:25, 163:5, 163:13, 164:17 firmly 107:7 first 5:3, 7:5, 9:15, 11:21, 14:1, 14:3, 14:4, 18:5, 34:21, 49:16, 50:1, 62:15, 62:25, 65:13, 93:25, 101:13, 106:19, 113:6, 124:16, 129:15, 129:24, 134:20, 147:11, 156:13, 157:6, 167:17, 175:24, 179:18, 188:41 fl 1:44 flew 129:20, 142:6, 142:9, 142:23, 142:25, 143:7 flight 3:26, 127:9, 129:24, 130:8, 131:12, 131:14, 132:6, 132:14, 133:6, 133:16, 133:18, 134:9, 139:18, 141:2, 143:6 flights 3:41, 129:4,	129:23, 132:4, 133:15, 135:1, 141:10, 141:12 flip 92:6 flown 128:7 fly 128:6, 163:14, 163:15, 163:21 fnb 3:39, 50:2, 50:10 focus 126:2 focused 127:24 focuses 182:20 focusing 126:17, 127:13 followed 94:14, 114:25 following 188:37 follows 5:3, 167:17 foregoing 187:1, 188:38 formally 52:10 formed 147:9, 147:17, 147:21, 148:1, 148:3 formerly 15:24 forming 124:6 forms 180:24 forth 89:21, 91:1, 91:12, 130:4 forward 63:10, 166:4 four 167:13	fourth 59:6, 94:18, 94:19 frame 166:5 framed 166:6 frcp 189:4 free 50:25, 76:20, 96:9, 101:11, 120:16 frequently 31:18 friday 52:6 fridays 10:14 friedens 129:17, 129:18, 129:21, 130:8, 130:12, 130:21, 131:13, 132:15, 134:10, 138:11, 139:16, 139:17 front 95:8, 112:15, 112:16, 161:14, 162:17, 165:1, 165:7 fulfilling 115:8, 115:14 full 5:14, 5:16, 12:23 full-time 104:8 fully 107:18 funeral 134:3 further 94:4, 179:7, 179:9, 189:4, 189:14, 189:16 <hr/> G <hr/> gabby 109:12, 124:1,	157:23, 166:23, 172:16, 172:20 games 53:8, 54:3, 54:8, 54:12 gates 2:11, 2:12, 4:20 gave 86:20, 131:15, 168:14, 169:6, 169:18 geez 102:22 general 136:6 generated 108:21, 109:17, 110:8, 110:13 generously 87:13 getting 28:22, 32:21, 73:16, 152:4, 166:7, 175:1 gift 169:15, 169:20 girls 53:10 give 79:4, 113:16, 114:10, 146:22, 167:19, 167:24, 168:3, 179:1 given 155:20, 189:20 gives 81:25 giving 76:25, 77:3, 122:4 go 6:20, 20:8, 22:8, 27:3, 28:4, 28:14, 32:15, 52:16, 53:3, 53:8, 54:3, 56:4,
----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Transcript of Angela Svonavec
Conducted on November 4, 2024

204

58:16, 58:17, 77:2, 86:4, 92:1, 96:13, 109:8, 129:6, 134:3, 135:13, 142:16, 144:23, 152:7 god 81:12 goes 53:14, 58:11, 113:3, 167:17 going 27:5, 32:22, 37:10, 50:13, 51:3, 51:7, 51:9, 58:18, 63:14, 64:2, 64:23, 93:22, 94:1, 97:4, 97:19, 101:3, 101:12, 106:16, 114:18, 116:20, 124:18, 127:5, 127:13, 130:7, 131:7, 134:1, 146:18, 166:4, 168:21, 175:2, 181:8 gone 141:10 good 5:6, 5:7, 16:23, 33:3, 79:4, 165:14, 167:14, 167:18 goodman 1:42, 4:23, 188:36, 189:23 goods 46:17, 46:20 google 75:9 gotcha 42:2 government 83:3 grade 51:17, 59:7	graduate 55:20 graduated 56:15, 56:17, 56:18 grain 37:22, 45:19 grandma's 9:5 grandmother 8:13 granted 168:4, 168:15, 169:7 great 5:16, 65:17 greater 3:17, 3:18, 63:18, 63:20, 64:3, 64:19, 69:9, 69:18, 70:6, 70:15, 71:21 green 142:20 grew 6:11 ground 31:24, 81:3 groups 92:1 grow 6:8 guess 8:5, 52:2, 65:4, 74:21 guesstimate 28:16 <hr/> H <hr/> hair 37:7 half 77:4, 77:5, 77:7, 77:8, 102:20, 102:21 halfway 101:17	hand 189:20 handle 40:5, 49:21, 98:20, 106:11, 148:8, 168:6, 169:3, 169:21 handled 23:21, 113:12, 146:7, 172:16, 180:6 hands 23:25 handwritten 89:19, 153:3, 159:16 hang 67:17 happened 30:6, 91:8, 91:9, 119:18, 149:17 happy 137:24 harbour 26:6 hard 65:16, 101:15, 102:21 harder 102:19 harvest 6:18 hate 8:5 hay 45:18 head 25:25, 38:24, 44:3, 111:12, 172:14 header 128:22 heading 76:25, 77:3, 102:25, 103:3, 120:13, 178:5, 178:14	heard 33:14, 172:11 hearing 78:16, 83:19, 84:12, 85:12 heating 41:4, 180:24, 182:20, 182:24 heavily 139:10 held 84:12, 149:21, 150:18 helene 143:15 help 64:7, 102:23, 129:13, 133:9, 174:5 helped 61:4, 65:16 helpful 166:3, 166:4 helping 153:22, 159:1 herbal 7:11 here 4:4, 11:21, 11:24, 12:18, 17:6, 26:10, 27:18, 27:23, 27:25, 28:1, 28:7, 28:8, 28:20, 28:21, 29:3, 31:22, 32:8, 42:14, 42:15, 43:5, 43:22, 54:23, 54:24, 56:1, 60:20, 68:15, 69:14, 75:22, 78:25, 80:20, 80:24, 81:4, 86:3, 91:10, 94:1, 96:12, 102:2, 103:1, 103:14, 111:7,
---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Transcript of Angela Svonavec
Conducted on November 4, 2024

205

111:8, 111:10, 112:4, 123:8, 123:19, 125:11, 126:16, 126:23, 127:12, 130:4, 130:12, 130:21, 132:6, 134:4, 134:12, 134:22, 137:18, 138:13, 138:15, 138:17, 141:11, 143:13, 143:14, 156:11, 163:12, 168:13, 176:12, 181:2, 181:10, 181:20, 183:6 here's 132:20 hereby 167:15, 167:16, 177:23, 187:2, 188:37 hereinbefore 188:39 hereto 1:46 heritage 1:4, 1:27, 4:6, 4:7, 34:15, 47:25, 48:3, 72:24, 73:2, 74:4, 76:8, 76:9, 76:18, 117:20, 117:22, 122:18, 123:9, 144:9, 144:20, 144:25, 145:6, 145:7, 188:4, 188:27 high 6:20, 6:23, 51:20, 52:2, 52:21, 53:5, 53:6, 53:13, 55:25, 56:7, 56:18, 61:12, 66:18 highly 61:5, 153:21	highway 63:25, 69:15 hill 142:20 hired 41:18, 183:4 hires 44:18 hiring 181:17 hold 138:23, 148:20 holding 1:4, 4:6, 46:14, 46:15, 47:25, 48:3, 72:24, 74:4, 122:18, 123:9, 188:4 holdings 34:15 hole 141:18, 142:9 home 11:25, 33:11, 56:5, 56:6, 59:22, 60:1, 61:8, 100:2, 100:5, 100:10, 100:16, 100:19, 100:22, 100:23, 101:24, 102:4, 102:15, 102:16, 104:3, 104:12, 105:3, 105:11, 110:6, 112:1 homes 111:7, 111:9 homesteaded 100:3, 100:8 honest 23:22, 48:22, 126:25 honestly 39:3 hospital 11:2, 11:4 hour 51:4	house 9:5, 12:2, 12:5, 12:6, 12:7, 12:13, 16:4, 17:9, 26:11, 26:13, 26:15, 28:11, 37:20, 37:21, 37:25, 41:3, 62:9, 62:22, 100:1, 100:2, 100:4, 100:15, 100:19, 102:3, 104:10, 108:7, 108:9, 108:13, 108:20, 109:15, 109:16, 110:12, 144:9, 144:20, 145:7 however 22:14 hub 181:17 huge 81:24 huh-uh 165:11, 167:23, 168:2 hundred 116:14 hurricanes 143:15 husband 23:8, 24:6, 31:10, 31:17, 62:9, 70:20, 78:15, 79:5, 82:20, 83:12, 83:22, 85:11, 88:12, 114:13, 115:19 husband's 87:10, 87:16 <hr/> I <hr/> idea 97:1, 97:18, 99:21, 119:15,	119:24, 120:1, 121:10, 121:20, 122:2, 123:6, 135:20, 139:24, 145:10, 151:3, 151:5, 158:23, 170:5, 177:12, 183:16 identified 36:2, 40:7, 74:4 identifies 36:4, 36:11, 62:16 identify 4:15, 168:13 identifying 90:16 immediately 59:1 impact 67:2, 68:17 impacted 69:15 important 68:22, 69:2 impossible 134:11, 159:17, 159:18 in-florida 129:23 inaccuracy 138:3 inaccurate 136:10, 138:13, 140:2, 140:4, 140:8, 140:16, 142:2, 143:13 inc 44:5, 46:7, 46:13, 47:3, 47:5, 103:22, 104:4, 104:13, 104:23, 105:4, 105:12, 105:16, 105:21, 107:13, 109:11, 109:17, 110:8, 110:13,
-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Transcript of Angela Svonavec
Conducted on November 4, 2024

206

112:7, 115:2, 115:6, 115:13, 115:19, 116:25, 117:5, 121:16, 122:5, 123:10, 125:8, 125:15, 126:6, 129:5 include 44:21, 81:7 included 68:10, 68:12 includes 68:13, 82:8 including 80:12, 80:13, 80:14, 84:11, 84:16 income 18:6, 18:18, 22:21, 23:7, 23:13, 23:15, 24:5, 92:13, 93:18, 96:21, 98:12, 98:23, 98:24, 99:5, 99:10, 99:15, 99:20, 108:21, 109:17, 110:8, 110:13, 115:20, 115:25, 116:7, 116:8, 118:17, 118:23, 118:24, 119:4, 119:6, 119:10, 121:8, 121:9, 121:13, 121:24, 122:4, 122:14, 122:17, 122:19, 122:22, 122:23, 122:24, 180:4 incorrect 74:11, 136:25, 139:7, 139:22 incredulous 164:9, 164:11 incurred 178:7, 178:15, 179:5	index 3:1 indicate 141:4 indicating 56:25 individual 18:6 industrial 39:17, 39:18, 39:21, 48:14, 48:19, 183:19, 184:2 industries 1:19, 3:35, 4:7, 39:2, 39:6, 39:7, 39:8, 39:21, 39:25, 40:4, 40:8, 40:13, 40:14, 41:2, 41:3, 41:18, 42:1, 44:18, 49:1, 123:9, 144:10, 144:21, 145:12, 145:16, 145:21, 146:4, 157:4, 157:13, 160:3, 160:7, 166:14, 166:19, 170:20, 171:5, 171:15, 176:18, 176:24, 177:9, 178:2, 179:20, 180:15, 183:4, 183:24, 183:25, 184:1, 188:19 industry 65:14, 81:22, 81:23, 81:24 inform 71:20 information 3:14, 3:15, 3:36, 20:20, 50:19, 64:21, 65:9, 73:17, 73:22, 89:22,	90:3, 91:13, 94:21, 109:21, 110:24, 129:8, 129:10, 131:11, 135:13, 141:7 ingenuity 65:16 initial 177:24 initials 95:17 insight 94:4 instance 1:39 instances 155:10 instead 20:4, 171:17, 176:1 instructed 171:21, 172:13 instruction 33:3 integrity 66:2 intend 20:20, 132:3, 137:12, 137:14 intended 80:9, 81:6, 82:2 intending 71:15, 167:16 intention 73:16, 80:10, 81:10, 81:12, 82:7, 90:22 intercompany 41:19 interest 3:28, 3:29, 3:30, 3:32, 33:8, 33:12, 34:22, 34:23, 35:2, 35:6, 35:21, 47:20, 63:25, 69:10,	147:4, 147:5, 148:5, 148:9, 148:12, 148:13, 148:14, 148:18, 148:20, 148:23, 149:3, 149:11, 149:21, 149:24, 150:1, 150:3, 150:6, 150:13, 150:23, 151:2, 151:7, 151:10, 151:11, 151:18, 152:9, 152:21, 153:15, 155:24, 157:3, 157:4, 157:5, 157:8, 157:12, 157:14, 157:21, 160:16, 166:13, 166:15, 166:19, 170:19, 171:3, 171:4, 171:10, 171:11, 171:14, 171:15, 171:16, 171:17, 171:18, 172:25, 173:2, 173:6, 173:7, 173:9, 174:9, 174:11, 174:12, 176:6, 177:6, 177:10 interested 189:17 interests 73:1 internal 106:20 interrupt 38:3, 48:25, 104:11 intervention 52:16 interview 76:13 interviewed 70:17, 75:20, 76:15 inventory 134:23
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Transcript of Angela Svonavec
Conducted on November 4, 2024

207

involved 110:17 ir 101:6 irs 3:25, 101:7, 102:9, 103:25 island 141:17, 142:6 isles 26:6 issue 114:15, 137:24, 166:8	154:12, 155:2, 155:5, 155:18, 155:21, 156:3, 156:13, 157:4, 157:7, 157:13, 158:4, 159:4, 159:11, 160:12, 160:24, 161:3, 161:9, 161:16, 162:7, 165:6, 165:12, 165:22, 170:12, 173:8, 173:12, 173:25, 174:8, 174:11 jason's 3:29, 49:9, 62:17, 78:15, 81:21, 82:20, 84:9, 85:12, 86:7, 92:23, 147:5, 148:17, 149:21, 151:1, 151:7, 151:18, 152:9, 152:20, 152:21, 153:3, 153:7, 153:15, 155:24, 156:1, 157:5, 157:14, 157:21, 160:16, 166:15, 166:19, 171:10, 171:16, 171:18, 172:25, 173:8, 174:6, 174:11, 174:12 jennifer 6:3, 6:4 jobs 32:1 jodi 1:42, 4:23, 188:36, 189:23 johnstown 9:14, 11:5, 49:24, 50:2, 75:4, 75:11, 75:13, 83:4 joiner 51:1	joint 22:10 jointly 21:2, 21:16, 22:4, 23:2, 23:8, 23:16, 25:6, 49:9, 92:14, 93:4, 93:19, 95:1, 95:3, 95:18, 96:22, 97:5, 99:4, 99:18 judge 3:21, 78:15, 78:18, 78:23, 81:6 july 32:9, 32:10, 54:1, 73:5, 140:19, 141:4, 141:13 june 70:8, 70:24, 71:11, 88:24, 89:8, 89:9, 89:12, 131:3, 131:5, 133:10, 134:9, 138:11, 138:12, 140:13, 170:1, 170:2, 170:9, 170:17, 171:2, 171:9, 171:12, 175:13, 176:1, 176:7, 176:19, 177:1 jurisdiction 184:9	keeps 179:2 kept 150:19 kind 35:23, 91:25, 106:15 kinds 182:18 kissimmee 43:6, 43:10, 127:7, 127:9 knew 72:9, 72:11, 90:9, 162:22 knowing 87:8, 136:9 knowledge 34:16, 35:14, 87:15, 89:22, 91:13, 91:15, 96:20, 99:8, 109:21, 121:15, 181:18, 181:21 knows 57:11, 147:24 krasik's 71:4 kripalu 7:10 ktrv 1:13, 4:6, 144:24, 145:9, 188:13
J		K	
jack 43:11, 43:14, 43:16 jackson 141:18, 142:9 january 131:4 jason 8:19, 8:23, 10:20, 11:9, 11:13, 17:7, 17:18, 18:9, 18:15, 18:19, 19:14, 22:23, 23:14, 31:4, 31:13, 39:4, 57:1, 60:8, 61:3, 62:9, 70:20, 71:20, 74:5, 74:8, 79:9, 79:17, 81:13, 81:18, 81:20, 82:3, 87:12, 89:14, 91:5, 92:14, 93:4, 93:19, 99:10, 99:23, 103:20, 109:9, 112:21, 130:11, 144:16, 152:10, 152:22, 153:10, 153:14, 153:24,			land 48:15 landscaping 90:9 lane 12:2, 12:3, 30:14, 30:20, 30:23, 32:13, 32:14, 48:12, 61:7, 74:9, 74:17, 89:7, 89:15, 90:17,
		L	

Transcript of Angela Svonavec
Conducted on November 4, 2024

208

91:5 larger 81:20 largest 43:3, 43:4 last 15:5, 29:3, 65:13, 65:24, 66:17, 70:19, 79:8, 79:25, 124:5, 129:15, 143:5, 143:10, 143:15, 152:13, 153:2, 165:21, 175:21 later 40:24, 92:21, 95:10, 95:11, 171:19, 176:14, 177:5, 184:11 laura 161:22, 161:23, 165:1, 165:7 law 83:2, 119:14, 162:2, 162:4, 162:13, 162:25, 163:5, 163:13, 164:17 laws 121:15 lawsuit 40:6, 183:21 lawyer 148:7, 183:15 lawyers 34:2, 44:11, 84:9, 99:22, 101:9, 112:12, 114:20, 168:5, 182:2, 182:3 lease 42:22, 42:23, 43:17, 112:23, 113:6 leases 46:23, 46:24, 113:11	leasing 38:25, 41:9, 41:15, 42:1, 42:5, 42:6, 42:7, 42:10, 42:16, 44:7, 45:24, 123:4, 123:10, 124:24, 125:4 least 7:17, 23:7, 29:2, 71:10 leave 24:9, 50:15, 130:3, 130:23, 130:24 leaving 176:1 left 59:15, 59:21, 128:22, 130:2, 139:15 legally 31:16, 167:16 leisurely 50:25 less 161:11 let's 11:20, 22:19, 39:6, 58:16, 61:11, 64:6, 94:6, 104:15, 117:8, 134:8, 136:17, 162:9, 176:16, 178:7 letter 3:21, 3:23, 20:10, 78:14, 78:18, 78:23, 79:8, 81:11, 81:17, 83:12, 83:16, 83:22, 85:7, 85:10, 86:6, 95:21, 106:18, 106:19, 120:9, 120:17 letters 19:3, 83:25,	84:1, 84:17, 97:1 levitate 143:14 lewis 106:21, 106:23 liability 1:6, 1:21, 188:6, 188:21 license 27:14, 27:19, 27:22, 28:1, 28:22, 54:15, 54:19, 55:1, 55:11, 55:14, 55:19, 56:14 life 66:11, 131:25 light 137:24 likely 130:22, 133:23, 133:24 limited 1:6, 1:20, 68:11, 68:19, 91:16, 96:20, 188:6, 188:20 line 18:9, 18:10, 18:21, 19:19, 19:20, 21:9, 21:23, 24:11, 24:16, 25:3, 25:10, 77:25, 79:8, 129:15, 133:11, 134:8, 186:4 lines 35:1, 94:22, 95:13 list 74:17, 92:23, 120:17, 123:8 listed 24:22, 24:24, 63:6, 74:9, 74:11, 89:14,	133:16, 134:9, 141:2, 144:16 listing 129:22, 140:19, 140:22 lists 22:23, 23:13, 35:1, 129:16, 133:18, 145:11 litigation 34:8, 128:16, 136:15 little 8:12, 9:6, 17:17, 32:12, 35:19, 102:19, 102:21, 142:22 live 6:19, 8:11, 8:14, 9:3, 9:24, 17:7, 17:18, 27:25, 58:25, 59:22, 61:19, 105:19, 111:7 lived 7:22, 8:12, 8:13, 9:5, 10:6, 11:18, 16:3, 16:6, 16:19, 17:9, 17:24, 18:14, 26:5, 27:25, 31:9, 51:21, 53:23, 58:24, 72:2, 72:11 lives 31:8, 112:2, 112:3 living 60:13, 62:22 llc 1:5, 1:13, 1:19, 1:28, 3:28, 3:29, 3:35, 4:6, 39:21, 39:25, 40:4, 41:2, 41:10, 41:15,
--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Transcript of Angela Svonavec
Conducted on November 4, 2024

209

42:5, 42:7, 42:10, 42:16, 44:7, 45:10, 45:24, 47:8, 47:16, 47:21, 72:24, 73:3, 74:5, 123:4, 123:10, 124:24, 128:25, 129:5, 135:5, 144:10, 144:20, 144:21, 145:12, 145:16, 147:4, 147:5, 148:6, 148:10, 148:13, 148:14, 148:18, 148:20, 148:23, 149:3, 149:11, 149:21, 149:24, 150:2, 150:3, 150:7, 150:13, 151:2, 151:7, 151:11, 151:18, 152:9, 152:22, 153:15, 155:24, 157:5, 157:13, 157:14, 157:21, 160:4, 160:7, 160:16, 166:14, 166:15, 166:19, 170:20, 171:3, 171:5, 171:11, 171:15, 171:17, 171:18, 171:19, 172:25, 173:2, 173:9, 174:12, 174:13, 176:18, 176:24, 177:9, 177:10, 178:2, 188:5, 188:13, 188:19, 188:28 llp 2:11 loan 33:8, 34:22, 35:12, 35:21, 35:22, 35:23 local 43:23, 66:2,	66:20, 66:23, 67:1, 68:4, 68:23, 69:1, 69:19, 79:9, 79:12, 79:17, 80:4, 81:6, 81:7, 81:10, 81:17, 82:3, 86:23 location 80:16, 90:10, 90:12, 91:9, 103:22, 104:4, 104:12, 105:4, 105:12, 181:10, 184:2 locations 44:19, 44:20 log 131:15, 131:16, 131:17, 131:18, 131:23, 131:24, 133:4, 133:7, 141:14 logged 142:17, 142:25 logs 141:20, 142:15, 143:1, 143:18 long 16:2, 16:17, 20:12 longer 55:4, 55:13, 71:21, 72:1, 101:5 look 14:1, 14:22, 15:22, 18:5, 18:17, 18:20, 19:18, 20:25, 21:7, 21:15, 22:11, 22:19, 28:16, 33:17, 35:19, 64:8, 65:24, 73:8, 75:9, 84:8, 88:24, 89:6,	92:19, 94:20, 95:16, 101:11, 103:2, 106:18, 106:25, 109:8, 113:20, 117:8, 123:14, 127:17, 127:18, 127:22, 129:15, 131:22, 132:2, 133:11, 134:8, 136:5, 144:15, 152:15, 153:1, 156:1, 167:12, 170:11, 173:5, 176:16, 177:16, 179:7 looked 70:11, 174:13, 175:19 looking 21:10, 33:1, 93:25, 120:9, 130:18, 131:11, 151:10, 154:21, 155:24, 155:25, 160:17, 169:25 looks 19:4, 20:8, 88:14, 132:22, 154:23, 165:15 lookup 3:15 loopy 158:13 lot 7:2, 20:8, 32:5, 36:24, 37:4, 45:17, 45:18, 54:13, 60:12, 78:4, 80:20, 83:25, 85:1, 103:1, 110:24, 111:1, 124:6, 129:9, 142:4, 166:8 lots 150:4 low 175:1	lucky 54:12 lynn 5:18, 5:20 lyons 43:11, 43:14, 43:16 <hr/> M <hr/> ma'am 5:10, 5:21, 6:8, 6:21, 18:22, 24:20, 63:14 machine 1:43 mack 126:24 made 15:14, 72:5, 74:19, 77:25, 78:3, 89:23, 90:25, 97:22, 113:14, 113:25, 114:13, 160:1, 160:4, 160:8, 170:4, 171:9, 172:20 mail 36:25, 39:2, 39:3, 39:5, 44:10, 178:23, 179:3 mailbox 36:25, 40:2 mailed 83:13, 83:16, 145:18 mailing 36:24, 38:5, 38:23, 39:24, 40:4, 41:12, 44:5, 44:8, 46:8, 46:9, 47:25, 48:9, 63:9, 64:25, 65:4, 74:9, 145:17, 184:3
----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Transcript of Angela Svonavec
Conducted on November 4, 2024

210

mailings 65:3	178:15, 179:8, 179:9	10:20, 11:13, 31:13	49:20, 50:6, 54:9, 54:11, 55:19, 64:20, 69:8, 71:2, 77:9, 84:24, 86:19, 96:15, 129:21, 129:25, 136:20, 136:25, 147:21, 147:22, 149:7, 154:11, 154:18, 156:8, 156:18, 157:17, 165:14, 176:4, 177:20, 178:21
main 36:25	managing 40:22, 178:7, 178:16, 179:5	married 8:18, 8:23, 11:9, 16:12, 21:2, 21:16, 22:4, 23:16, 25:6, 92:14, 93:4, 93:18, 94:25, 95:1, 95:3, 95:14, 95:17, 95:18, 96:22, 96:23, 97:5, 97:6, 98:6, 99:4, 99:18, 156:6	meaning 20:8, 49:21, 86:7, 87:24, 112:21, 175:16
maintain 148:6, 148:14	manifesting 14:15	marrying 8:23	means 18:21, 20:7, 25:19, 46:24, 60:23, 86:25, 87:3, 95:2, 95:3, 100:6, 131:19, 131:22, 132:1, 133:17, 154:13, 154:20, 168:1, 179:2
maintained 10:16	many 65:14, 82:6, 86:8, 86:13, 86:15, 127:15, 133:8, 142:15, 152:23	maryland 6:15, 6:16, 63:24, 68:14, 68:25, 69:24, 80:14	meant 86:22
maintains 148:18	map 80:16	massachusetts 7:10	mechanic 7:12
maintenance 107:7	march 138:11, 140:13	math 16:23, 16:24	mechanics 7:11
make 14:20, 25:16, 32:22, 36:15, 50:4, 52:18, 87:20, 114:22, 134:5, 134:6, 166:10, 180:21, 181:22, 182:21	mark 13:10, 170:22	matter 4:6, 34:12, 184:9	media 4:4
makes 42:3, 96:3, 181:24	marked 13:14, 13:16, 14:11, 14:12, 18:1, 18:3, 33:5, 33:6, 34:5, 56:20, 56:21, 61:22, 62:2, 63:13, 63:15, 70:1, 70:2, 72:20, 72:21, 74:22, 74:24, 78:12, 78:13, 82:15, 82:17, 85:3, 85:4, 88:8, 88:10, 94:7, 101:2, 101:4, 124:10, 124:11, 128:10, 144:5, 144:6, 146:17, 146:24, 156:25, 157:1, 159:23, 159:25, 166:1, 170:24, 171:1, 174:17, 174:19	maturity 35:2	medicine 7:8
making 14:24, 14:25, 15:16, 73:16, 157:23	marks 184:16	maybe 8:5, 13:7, 16:13, 39:2, 44:25, 53:15, 77:9, 103:9, 130:11, 130:25, 137:7, 137:8, 152:4	meeting 72:16, 148:24, 149:2, 149:11, 149:20, 150:13
manage 112:4, 117:21, 117:23, 118:3, 181:9, 181:16	marriage 9:4, 9:9,	mcintosh 88:13	meetings 65:1, 72:7, 72:10, 148:21, 148:25, 149:9, 149:24, 150:2, 150:18, 151:4
management 49:18, 49:20, 49:21, 50:1, 50:2, 50:8, 113:1, 115:3, 117:6, 117:19, 118:6, 118:9, 118:14, 119:22, 121:22, 177:20, 177:21, 179:11, 179:13, 180:7, 181:8, 181:9, 181:19, 183:5, 183:13		mcintosh's 89:6	
manager 177:24, 178:1, 178:6, 178:14,		mean 19:25, 21:2, 23:14, 43:8, 44:23, 47:12,	

Transcript of Angela Svonavec
Conducted on November 4, 2024

211

mejia 2:18 mejio 4:12 member 40:22, 85:21, 144:16, 151:12, 177:23, 179:10, 179:12 members 86:9, 86:16 membership 3:30, 3:32, 157:3, 157:7, 157:8, 157:12, 166:13, 170:19, 171:4, 171:10, 171:16, 173:6, 173:7, 174:9, 176:6, 177:6 memorialized 132:7 memorializes 62:8 memory 29:4, 110:16 menopausal 11:6 mentioned 41:9, 44:4 merits 184:11 metz 106:21, 106:23, 120:9 meyersdale 5:22, 5:23, 39:10, 39:11, 39:13, 39:15, 145:7, 183:20, 184:5 michelle 2:18, 4:12 middle 15:23, 59:17, 89:19, 90:25, 101:20, 106:15, 106:18, 107:2,	120:12 might 53:20, 87:25, 88:3, 92:8, 96:20, 135:5, 149:10, 169:11 milford 15:25 milton 143:15 mind 52:18 mine 32:4, 49:8, 49:24, 154:24, 181:13, 181:21 minimize 71:17 mining 68:22, 68:25, 80:24, 81:2, 181:23 minuscule 156:11 minute 150:4, 161:2 minutes 51:5, 149:23, 150:2, 150:12, 150:19, 151:4 misidentified 103:16 missing 142:4 mobile 39:10 mom 11:3, 86:13 mom's 85:19, 85:20 moment 25:14, 160:17, 172:12 money 119:3, 119:10, 121:21 monitor 4:11	montana 119:2 month 32:9, 32:10, 112:8, 112:25, 113:10, 113:25, 114:12, 115:17, 161:12 months 124:5, 134:12, 136:6, 140:10, 176:14 moorings 13:1 more 10:18, 16:19, 40:24, 76:24, 82:6, 89:5, 110:24, 111:1, 111:2, 112:16, 161:24, 176:3 morella 2:4, 4:17, 74:1, 162:2, 162:4, 162:12, 162:25, 163:5, 163:13, 164:17, 172:20 morning 5:6, 5:7, 77:18, 77:19 mornings 10:14 mortgage 33:11, 35:6, 35:17 most 10:13 mostly 6:13, 7:9, 45:17, 56:1 mother's 130:24, 130:25, 131:2 motion 3:22, 3:31, 82:19, 84:16, 137:14, 160:11,	160:12, 162:10 move 26:11, 28:20, 37:7 moved 8:14, 10:7, 11:21, 13:3, 17:6, 28:1, 28:20, 56:15, 62:25, 96:4, 96:12 moving 25:25, 111:12, 172:14 much 50:25, 52:5, 71:9, 81:20, 82:1, 101:11, 118:9, 120:16, 134:16, 179:21 mud 8:15, 9:6, 11:18, 15:24, 16:3, 17:4, 17:8, 17:19, 18:15, 22:24, 30:2, 30:6, 30:17, 61:16 mulch 41:3 multistate 63:22 must 76:12, 106:21 myself 65:23, 102:24, 152:5 <hr/> N <hr/> name 5:8, 5:16, 5:19, 6:2, 9:1, 10:22, 36:1, 47:11, 48:20, 49:9, 49:23, 49:25, 89:7, 92:23, 114:8, 114:10, 133:18,
-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Transcript of Angela Svonavec
Conducted on November 4, 2024

212

144:9, 144:19, 145:1, 145:7, 186:2 named 188:39 names 89:6, 113:16, 114:6, 123:20, 133:12, 134:22, 141:20 naples 1:44, 4:14, 12:18, 26:7, 26:10, 42:14, 42:16, 77:5, 77:8, 111:23, 111:24, 127:9, 127:10, 129:17, 129:20, 130:8, 130:20, 131:13, 132:15, 132:21, 132:25, 134:10, 139:15, 139:17, 140:23, 141:3, 143:6 narrative 89:19 nation 65:17 national 49:16, 50:1 native 65:25, 71:2 natives 70:21, 71:20 natural 1:27, 73:2, 76:18, 144:25, 188:27 nature 41:1, 42:4 naturopathic 7:8 nd 13:22 necessarily 65:1, 147:20 necessary 111:5, 115:10	need 27:5, 50:13, 79:15, 96:13, 105:15, 105:18, 105:20, 105:24, 123:14, 137:15, 143:21, 144:4, 161:24, 168:21, 175:12 needed 107:20, 115:12, 155:11 needs 45:1, 79:9, 79:17, 81:13, 81:18, 82:3 neither 189:14 network 80:15 never 33:14, 33:25, 34:20, 36:20, 39:3, 47:17, 50:24, 82:22, 92:17, 97:8, 97:9, 102:7, 102:9, 102:12, 104:7, 128:18, 129:11, 131:16, 131:25, 134:20, 134:25, 135:25, 136:1, 139:19, 162:14 new 12:15 newly 145:9 newport 141:18 news 57:14 newsletter 64:25 newspaper 75:3, 75:6, 77:13, 77:22, 77:23	next 19:10, 19:20, 19:21, 19:22, 21:23, 23:12, 24:14, 24:25, 25:5, 25:10, 63:3, 64:2, 97:19, 107:9, 107:10, 134:8, 134:9, 140:19, 140:22, 141:2 ninth 51:16 noble 65:15 nobody 44:14, 112:3, 134:23, 136:1 none 118:25, 177:15 nonresident 18:24, 19:5, 20:2, 24:18 normally 65:23 north 127:6 notary 160:25, 161:1, 162:15, 163:4, 163:21, 165:2 note 34:10, 35:1, 35:2 noted 187:3 nothing 117:17, 189:1 november 1:35, 1:41, 4:2, 4:10, 54:7, 186:3, 188:34, 188:40, 189:20 number 4:4, 4:9, 34:2, 35:1, 37:15, 38:5, 64:6, 91:24, 94:8,	101:13, 102:20, 173:14 numbered 1:41 numbers 34:3, 101:15 nursing 7:5, 7:21 <hr/> o <hr/> o'keefe 106:21 oath 5:10, 15:8, 15:23, 20:15, 67:5, 67:10, 68:4, 77:24, 79:16, 80:22, 81:11, 113:24, 114:11, 153:9, 163:23, 164:6 ob 11:5 objection 84:22, 139:12, 140:5, 148:15, 151:21, 152:7, 156:17, 161:18, 163:1, 163:25, 168:17 objections 68:9 obligations 5:10 obviously 26:24, 54:4, 94:1, 115:8, 131:20, 132:12, 136:20, 141:10 occasion 44:22, 44:23, 85:18 occupants 136:24 occurred 110:19 october 53:15, 54:7,
----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Transcript of Angela Svonavec
Conducted on November 4, 2024

213

<p>161:11, 162:5, 162:13, 162:16, 162:25, 163:5, 163:8, 163:14, 163:18, 164:17, 164:20, 165:7 office 34:9, 34:14, 34:15, 37:19, 38:8, 38:9, 39:15, 42:14, 42:15, 45:3, 45:4, 62:17, 74:19, 103:22, 104:4, 104:12, 104:21, 105:4, 105:11, 105:16, 105:18, 105:21, 105:25, 106:4, 107:4, 107:7, 107:11, 107:15, 108:1, 108:10, 113:9, 115:13, 155:7, 164:17, 181:2, 181:3, 181:7, 183:17, 183:19, 184:2, 189:20 officer 106:20 offices 1:43, 44:13, 49:2, 63:10, 145:6, 162:4, 162:12, 162:14, 162:24 official 11:22, 15:8, 40:3 offset 108:20, 109:17, 110:8, 110:13 often 28:4, 28:5, 31:17, 43:1, 52:25, 53:2, 53:9 oh 10:4, 15:5,</p>	<p>19:7, 25:2, 34:25, 36:12, 53:1, 59:20, 71:10, 88:23, 89:8, 94:19, 101:5, 108:15, 110:1, 113:5, 126:14, 126:21, 127:15, 128:12, 142:21, 144:15, 152:18, 158:23, 175:18, 177:19 ohio 142:19 one 4:5, 6:1, 36:16, 37:11, 37:18, 43:12, 43:23, 44:5, 44:12, 44:14, 46:7, 46:9, 46:13, 47:2, 47:5, 49:4, 50:14, 53:3, 59:25, 60:13, 63:2, 63:9, 65:20, 70:8, 81:11, 83:6, 92:1, 92:7, 94:14, 94:21, 95:7, 101:16, 102:19, 103:22, 104:4, 104:12, 104:23, 105:4, 105:12, 105:16, 105:21, 107:13, 107:20, 108:14, 108:20, 109:5, 109:10, 109:16, 110:8, 110:13, 110:23, 110:25, 112:3, 112:7, 112:17, 112:22, 113:9, 114:8, 114:12, 115:2, 115:6, 115:13, 115:19, 115:22, 116:24, 117:5,</p>	<p>117:20, 118:12, 118:20, 119:21, 120:8, 120:23, 121:16, 122:5, 123:10, 123:25, 125:1, 125:4, 125:8, 125:15, 126:6, 126:11, 126:21, 126:22, 129:5, 132:23, 135:15, 142:16, 150:17, 164:13, 167:12, 173:16, 176:3, 182:22, 184:5 ones 142:17 online 60:21 only 29:1, 49:11, 50:8, 81:19, 110:23, 110:25, 126:9, 131:9, 131:11, 135:13 oops 120:11 open 152:18, 160:15 opened 154:18 operate 69:14, 180:11, 180:15 operates 125:8, 125:14 operating 3:28, 3:29, 3:34, 124:24, 147:4, 147:12, 147:20, 151:6, 151:11, 151:17, 151:22, 152:8, 152:19, 152:21, 153:15, 153:24, 160:16, 174:12, 176:18, 176:23, 177:8</p>	<p>operations 41:5, 41:7, 42:7, 42:10, 42:13, 46:1, 46:4, 47:21, 180:22, 181:3, 181:6 opposed 63:6 opposition 137:14 options 21:15, 21:21, 25:6, 94:24 oral 1:33, 1:38, 137:18 orange 54:24 order 7:14, 94:10, 94:11, 177:12, 184:19 ordinary 107:8 organize 178:23 originally 40:1 orlando 127:12 other 12:1, 14:24, 26:5, 26:14, 28:4, 31:20, 31:22, 31:23, 38:19, 40:18, 40:24, 48:7, 48:8, 48:12, 49:5, 77:5, 86:1, 86:4, 87:23, 90:12, 107:3, 107:10, 111:14, 111:16, 115:22, 118:21, 123:9, 123:11, 123:13, 123:22, 126:6, 126:14,</p>
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Transcript of Angela Svonavec
Conducted on November 4, 2024

214

126:18, 127:20, 130:5, 133:3, 134:12, 136:12, 137:4, 137:13, 138:24, 141:10, 141:12, 142:1, 146:12, 147:17, 153:22, 154:3, 155:10, 155:20, 180:24 others 43:21, 44:2, 65:14, 132:24, 132:25, 145:18 otherwise 189:17 out 42:14, 42:15, 43:2, 49:24, 64:7, 65:7, 75:3, 75:5, 75:7, 75:11, 94:11, 99:12, 99:14, 126:23, 135:15, 137:11, 138:2, 141:23, 173:7, 174:25, 181:11 outcome 189:18 outside 7:18, 7:22 over 26:5, 28:9, 28:15, 53:12, 78:5, 83:25, 133:11, 138:24, 141:15 own 30:8, 47:17, 48:3, 48:12, 48:15, 49:5, 52:18, 56:15, 61:8, 92:17, 104:24, 111:16, 114:23, 115:1, 123:11, 123:22, 125:15	owned 8:14, 9:6, 11:19, 25:20, 26:24, 27:12, 29:24, 30:1, 30:25, 41:24, 48:20, 49:9, 62:25, 68:24, 73:2, 76:8, 103:20, 129:4 owner 40:17, 40:18, 40:19, 40:22, 40:23, 45:21, 45:22, 45:23, 45:24, 45:25, 47:2, 47:5, 48:5, 49:6, 68:19, 68:21, 76:16, 104:25, 105:10, 107:13, 107:24, 108:18, 109:1, 109:3, 109:4, 109:10, 148:9, 148:13, 148:23, 150:1, 180:18, 182:1, 182:11 owners 40:24 ownership 145:8, 166:18 owning 12:10 owns 46:16, 49:13, 126:7 <hr/> P <hr/> pa 2:6, 2:14, 6:18, 15:25, 18:21, 18:24, 19:4, 19:25, 24:6, 24:17, 50:2, 55:6, 60:20, 62:18, 66:1, 70:21,	71:20, 71:22, 85:24, 92:7, 99:4, 99:18, 129:17, 129:21, 134:2 packet 94:18 page 3:2, 3:10, 18:5, 18:17, 20:25, 21:7, 22:20, 23:12, 50:19, 64:8, 65:12, 70:19, 76:23, 89:19, 90:25, 92:20, 94:6, 94:7, 101:20, 101:21, 103:10, 103:16, 106:12, 106:17, 106:19, 106:25, 107:1, 109:23, 110:5, 112:13, 113:22, 117:8, 117:18, 120:7, 120:13, 129:16, 135:15, 151:15, 152:13, 153:1, 153:2, 154:21, 154:22, 154:23, 155:25, 156:3, 158:3, 165:21, 167:12, 175:21, 178:9, 178:11, 178:13, 186:4, 189:10 pages 92:21, 94:14, 95:6, 95:8, 95:10, 129:7, 135:16, 135:22, 138:22 paid 35:15, 90:7, 110:7, 114:12, 115:18, 118:10, 118:14, 118:23, 119:4, 119:6,	119:22, 121:8, 121:21, 121:23, 179:13, 179:18, 179:20, 180:1, 180:4 pam 87:4, 87:6, 87:8, 87:15 paper 36:14, 94:18, 101:21, 158:19, 158:22 papers 146:13 paperwork 137:1, 137:5, 162:11, 172:17 paragraph 14:1, 14:3, 14:4, 14:22, 15:6, 62:15, 65:13, 65:24, 70:20, 77:3, 82:24, 84:8, 91:4, 91:7, 91:8, 107:1, 107:2, 112:19, 147:11, 157:6, 175:24, 177:16, 177:17, 178:4, 178:10, 178:11, 178:13, 179:7, 179:9 paragraphs 167:13 parent 53:3, 60:13 parents 6:19 park 39:17, 39:18, 39:21, 48:14, 48:19, 183:19, 184:2 part 18:24, 19:5, 20:2, 24:19, 104:2, 110:4,
-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Transcript of Angela Svonavec
Conducted on November 4, 2024

215

<p>115:2, 120:9, 144:24, 157:16, 157:20, 166:25, 181:3, 183:1, 183:13 parties 34:13, 74:3, 167:16, 189:15 party 34:12, 189:6, 189:13 passenger 133:12, 133:15, 133:17, 133:18 passport 3:40, 57:18, 57:21, 58:3 past 50:23 pay 99:5, 99:10, 99:12, 99:14, 99:15, 99:20, 100:12, 112:7, 113:25, 115:20, 116:1, 116:8, 117:6, 118:16, 119:10, 120:3, 121:12 paying 112:24, 113:9, 115:17, 121:5, 121:24, 122:4 pdf 184:24 penalties 15:16, 20:15, 89:23 pending 137:10 people 63:11, 80:16, 83:25, 85:1, 87:23, 130:5, 163:15, 169:3 people's 126:14, 126:18 period 92:9, 92:12,</p>	<p>122:23 periodic 64:25 perjury 15:12, 15:16, 20:15 permit 84:21 permitted 15:7 person 14:24, 67:19, 68:8, 90:6, 102:12, 161:14 personal 49:19 personally 58:15, 157:5, 157:21, 166:15, 166:20, 170:20, 171:11, 171:17, 172:25, 173:1, 177:7 perspective 169:14, 169:16, 176:5 phone 53:2, 58:4, 58:9, 58:10, 58:13, 75:21, 75:22, 78:5, 152:18, 152:24 physical 184:1 physically 159:3, 159:11 picked 10:4, 10:5, 127:12, 174:8 piece 44:24, 94:18 pike 8:15, 9:7, 11:18, 15:24, 16:3, 17:5, 17:8, 17:19, 18:15, 22:24, 30:2, 30:6,</p>	<p>30:17, 61:16 pilots 134:23 pittsburgh 2:6, 2:14, 7:21, 55:7, 75:7, 84:13, 130:13, 163:21, 164:25, 165:3 place 4:13, 26:19, 113:2 places 133:3, 141:10, 141:15, 142:1, 142:21 plaintiff 1:9, 1:23, 4:18, 188:9, 188:23 plaintiff's 3:31 plaintiffs 2:2, 4:18 plane 46:23, 46:24, 108:21, 109:18, 124:25, 125:8, 125:15, 125:22, 126:6, 126:19, 126:20, 126:23, 127:2, 127:16, 127:20, 129:4, 130:12, 130:19, 132:15, 132:21, 132:24, 134:24, 136:2, 136:3, 136:23, 142:2, 142:7, 142:9, 142:10, 142:24 planes 46:16, 126:14, 126:19 planet 4:12, 4:23 please 4:15, 7:3, 50:19, 58:17,</p>	<p>67:25, 70:19, 72:16, 79:24, 82:24, 106:13, 112:14, 120:7, 137:22, 165:19, 178:4 plus 52:17 point 8:18, 30:16, 71:8, 145:22, 183:9 pony 37:8 ponytail 37:9 portion 49:18, 108:9 portside 3:38, 13:2, 26:9, 27:1, 27:9, 28:11, 29:19, 30:3, 58:1, 62:22, 63:1, 63:7 position 40:13, 40:19, 74:13 positive 66:20, 67:3, 68:18 possible 34:13, 34:14, 153:19, 153:23, 159:15, 161:8, 163:4, 163:7, 166:10 possibly 61:3 post 62:17 practices 136:22 preceding 168:24 preparation 64:15, 93:25, 110:17, 135:6</p>
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Transcript of Angela Svonavec
Conducted on November 4, 2024

216

<p>prepare 84:23, 98:18, 106:11, 116:17</p> <p>prepared 20:17, 22:10, 22:14, 23:23, 78:7, 92:17, 93:6, 93:8, 134:21, 139:19, 139:25, 140:3</p> <p>preparer 96:25, 97:3, 97:4, 97:24, 98:1, 113:20</p> <p>preparers 93:15, 102:8, 104:6, 105:9, 106:10, 117:17</p> <p>preselected 173:21, 174:1, 174:8</p> <p>present 2:17, 98:7</p> <p>pretty 31:18, 52:5, 52:15, 84:20, 109:24, 111:5</p> <p>prevent 5:13, 145:1</p> <p>previously 27:18, 59:10</p> <p>principal 125:24</p> <p>printed 76:12, 76:14, 102:20</p> <p>prior 9:4, 9:8, 16:8, 17:22, 26:13, 63:1, 129:22, 129:25, 143:25</p> <p>priority 66:18</p> <p>private 129:17, 142:9, 142:10, 142:24</p> <p>privileged 137:23</p>	<p>probably 26:23, 51:15, 51:18, 53:21, 54:8, 54:11, 55:9, 56:17, 61:3, 76:11, 109:8, 139:23, 141:21, 157:22, 182:2</p> <p>problem 11:7</p> <p>procedure 1:45</p> <p>proceeding 189:16</p> <p>proceedings 184:12</p> <p>process 104:3, 106:23</p> <p>produce 94:9, 137:25, 181:13</p> <p>produced 1:39, 33:8, 33:24, 34:8, 34:10, 34:15, 101:9, 128:14, 128:16, 129:8, 136:15, 136:20, 137:16, 138:7, 138:21</p> <p>production 45:18, 144:4</p> <p>products 41:4, 180:24, 181:14</p> <p>professionals 20:17, 23:25</p> <p>proof 3:39, 3:42, 78:4, 78:5, 138:17, 138:20, 139:1</p> <p>propane 41:4</p> <p>proper 44:13, 63:11, 106:3, 107:3,</p>	<p>107:14, 107:25</p> <p>properly 99:25, 116:19</p> <p>property 3:38, 8:13, 9:6, 12:4, 12:5, 25:21, 26:15, 26:16, 26:18, 26:21, 26:22, 27:1, 27:6, 27:18, 27:21, 28:9, 29:18, 29:24, 30:6, 30:14, 31:1, 32:13, 35:5, 35:12, 35:16, 35:20, 37:3, 37:16, 48:12, 49:5, 49:6, 49:8, 49:13, 73:2, 98:19, 100:12, 103:1, 103:3, 103:19, 103:20, 107:10, 111:14, 111:16, 111:24, 112:20</p> <p>proudly 66:9</p> <p>provide 33:23, 33:25, 48:18, 128:19</p> <p>provided 90:8, 91:4, 92:5, 131:12, 135:14, 135:16, 143:3, 143:6</p> <p>providing 90:13</p> <p>provisions 1:46</p> <p>public 41:4, 160:25, 161:1, 165:2</p> <p>publication 64:25, 66:15, 70:5, 70:10</p> <p>publications 70:16</p>	<p>published 64:17, 64:21</p> <p>pull 141:14, 152:25, 153:22, 173:7</p> <p>pulled 152:23</p> <p>pulling 81:23</p> <p>pulls 141:19, 142:11, 142:13, 142:15</p> <p>purchase 62:13, 63:5</p> <p>purchased 27:11, 30:3, 49:7, 62:8</p> <p>purpose 78:24, 106:2, 106:3, 107:3, 107:11, 107:15, 108:1, 149:2</p> <p>purposes 135:2, 135:6</p> <p>pursuant 1:44, 189:4</p> <p>pursue 6:23</p> <p>put 15:19, 19:4, 19:5, 19:6, 23:25, 25:13, 72:19, 94:14, 176:3</p> <hr/> <p style="text-align: center;">Q</p> <hr/> <p>qualified 60:10</p> <p>qualifies 104:20, 105:6</p> <p>question 12:21, 22:16, 24:8, 25:18, 27:20, 29:15, 29:16, 35:21, 36:8, 36:10, 36:17, 46:22, 48:24, 51:2,</p>
-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Transcript of Angela Svonavec
Conducted on November 4, 2024

217

63:4, 64:2, 66:7, 67:15, 67:24, 68:1, 71:4, 79:24, 79:25, 87:14, 93:2, 93:21, 96:25, 97:19, 99:16, 100:11, 100:16, 104:20, 105:8, 109:13, 115:21, 116:12, 116:21, 119:12, 123:3, 125:20, 127:8, 137:9, 139:14, 140:6, 146:2, 146:12, 148:12, 150:6, 150:11, 151:1, 152:20, 155:15, 158:16, 158:21, 161:2, 164:3, 164:16, 165:20, 166:6, 168:18, 168:22, 171:13, 172:7, 175:9, 176:4, 179:16, 181:9, 182:1, 182:4, 182:9, 183:7, 183:16 questions 23:20, 78:5, 107:18, 107:22, 168:24, 184:13 quite 48:15, 141:13 quote 101:22	184:14, 187:1 reading 103:5, 140:25, 179:9 ready 32:22 real 26:21, 48:24, 149:13 really 8:4, 23:20, 29:20, 43:2, 50:25, 107:19, 111:4, 153:6, 165:14, 165:15 reason 19:24, 63:8, 105:24, 145:17, 153:22, 170:2, 170:6, 175:12, 175:16, 175:17, 175:18, 186:4 reasons 189:10 recall 7:4, 7:16, 8:4, 10:8, 14:8, 22:9, 26:23, 34:19, 35:15, 35:18, 53:1, 54:1, 54:18, 65:5, 65:8, 65:18, 65:19, 67:18, 70:17, 75:19, 75:23, 97:3, 97:9, 97:12, 97:17, 97:25, 100:9, 100:17, 100:18, 100:25, 104:2, 104:17, 106:1, 108:19, 113:23, 115:7, 115:11, 117:10, 117:17, 118:2, 118:5, 118:6, 118:8, 118:12, 120:2, 123:15, 123:20,	131:7, 131:10, 141:24, 149:4, 149:5, 149:6, 149:8, 149:14, 149:16, 150:8, 150:10, 150:14, 152:23, 153:12, 153:18, 154:7, 154:20, 155:9, 155:10, 155:11, 155:12, 155:23, 159:14, 163:16, 164:7, 175:16, 175:17, 176:22, 177:1, 183:9 receipt 167:14, 170:12, 170:15, 171:7, 176:21, 189:8 receipts 131:18, 134:15, 136:11, 178:23, 178:25 receive 65:4, 179:16 received 75:21, 75:22, 115:25, 122:23, 168:7, 168:14 receiving 118:6, 118:12, 119:3 recently 49:7 recess 58:20, 124:20, 175:4 recognize 13:16, 63:17, 72:23, 74:24, 78:14, 82:18, 85:10, 88:11, 153:6 recollection 22:2, 22:17, 23:8, 66:14, 70:14, 102:3, 102:15, 110:11,	113:8, 121:4, 149:19, 174:5 recommendations 157:23 record 1:46, 3:26, 5:17, 22:12, 34:11, 56:24, 58:19, 58:22, 88:16, 96:16, 103:15, 117:18, 124:19, 124:22, 129:1, 139:18, 154:6, 165:20, 175:3, 175:6 recording 73:1 recordkeeping 136:22 records 3:38, 27:6, 28:19, 29:18, 148:6, 148:14, 148:18 redacted 92:4, 94:13, 110:5, 129:9, 129:10, 132:8, 133:16 redactions 132:6 reduced 189:2 refer 67:10, 68:5, 80:9, 82:24, 84:9, 87:1, 90:25, 91:23, 140:18 reference 68:4 referred 35:23, 100:1, 100:4, 102:2, 102:3, 102:15 referring 19:17, 29:14, 67:5, 69:19,
R			
rate 35:2 read 14:8, 79:23, 79:25, 107:9, 117:13, 120:16, 129:12, 130:17, 140:25, 167:17, 168:19, 172:2,			

Transcript of Angela Svonavec
Conducted on November 4, 2024

218

79:12, 79:18, 80:5, 80:8, 84:16, 138:20, 139:1 refers 65:14, 66:23, 80:23, 102:10 refresh 22:1, 22:17, 23:7, 66:13, 70:13, 76:20, 102:2, 102:14, 110:11, 110:16, 113:8, 121:4, 174:5 regarding 9:19, 84:1, 167:7 region 69:1 registered 29:5, 57:1, 57:4, 57:6, 57:7, 57:11, 57:15, 112:23 registering 28:21 regus 1:43, 4:13 reimbursed 178:6, 178:15, 178:17 reimbursement 179:4 reiterate 143:19 related 81:7, 89:24, 189:15 relation 10:15 relationship 104:22 relaxed 10:18, 52:15 relocate 51:25 rely 137:12, 137:14,	140:25 relying 137:15, 139:4, 140:11 remand 3:31, 137:15, 160:11, 160:12, 162:10 remember 16:4, 17:11, 30:10, 30:12, 62:24, 63:2, 71:25, 72:12, 72:13, 72:15, 90:9, 126:25, 127:3, 132:13, 132:14, 132:18, 132:19, 134:1, 140:21, 142:21, 148:2, 150:5, 150:17, 161:12, 161:13, 162:11, 162:23, 163:18, 163:20, 163:22, 181:17 remoted 65:2 remotely 60:20, 155:1 rendered 179:11 rent 42:22, 42:23, 112:7, 112:11, 112:24, 113:9, 114:1, 114:12, 115:18, 116:25, 117:4, 120:3, 120:24, 121:2, 121:5, 121:22, 121:23 rental 42:6, 112:3 rented 26:24 rents 113:11 reorganization 124:6	reorganized 124:2 reorganizing 157:18 repairs 45:1 report 3:25, 101:7, 101:22, 102:11, 103:25, 129:11 reported 1:43 reporter 4:23, 4:25, 79:25, 138:23, 164:13, 172:4, 172:7, 184:19, 184:23, 185:1, 188:36 reporter's 3:8, 188:32 represent 4:16, 5:9, 34:7, 40:10, 92:8, 162:1 representatives 103:21 represented 104:6 representing 4:12, 4:18, 4:21, 4:23 repute 67:22 request 138:19, 138:25 requested 3:36, 189:6, 189:12 required 121:12 reserve 184:10 reside 8:2, 12:17, 12:24, 24:1, 28:7, 51:19, 55:24, 77:7,	83:3, 90:11 resided 11:12, 15:24, 32:14, 32:15, 32:17, 36:20, 51:23, 52:22, 70:23, 71:4, 71:9, 71:22, 72:1, 74:14 residence 6:17, 55:18 residency 19:10, 19:21, 21:10, 24:11, 24:16, 24:25, 26:7 resident 15:1, 18:21, 18:24, 18:25, 19:4, 19:5, 19:25, 20:2, 20:3, 24:6, 24:17, 24:19, 25:16, 31:21, 54:20, 54:23, 55:10, 60:9, 60:14, 71:17, 81:18, 83:1, 84:4, 99:23, 99:24, 115:24, 116:7, 119:9, 121:13, 122:13, 122:17 residents 66:2 resides 14:20, 56:9, 77:4 residing 12:20, 12:22, 17:4, 64:11, 71:12 resources 1:28, 73:2, 76:18, 144:25, 188:28 respect 66:1, 66:5,
---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Transcript of Angela Svonavec
Conducted on November 4, 2024

219

171:4 respond 29:15 rest 124:13 restate 67:25, 69:7 restated 3:34, 176:18, 176:23, 177:8 retired 80:20 return 8:2, 18:6, 18:14, 18:18, 19:19, 19:20, 20:21, 21:1, 21:8, 21:20, 23:7, 23:13, 24:10, 25:11, 92:7, 92:21, 95:2, 95:13, 120:13, 120:16, 120:24, 139:16, 143:12 returned 7:25, 10:14, 139:5, 140:18, 189:8, 189:9 returns 3:13, 17:23, 18:2, 20:14, 23:2, 23:15, 24:5, 33:12, 91:25, 92:5, 92:13, 92:22, 93:3, 93:10, 93:17, 93:18, 96:10, 96:21, 96:22, 97:5, 97:6, 98:6, 99:19, 120:17 revenue 106:20 reversed 11:3 review 75:8, 75:17	rhode 141:17, 142:6 rick 28:23, 28:25 rid 55:5 ridge 12:2, 12:3, 12:12, 17:10, 17:14, 30:14, 30:20, 30:23, 32:13, 32:14, 48:12, 61:6, 61:16, 74:9, 74:17, 89:15, 90:17, 91:5 right-hand 21:9 rights 168:4, 168:15, 169:6 ritchie 43:2, 43:16 rn 7:7 road 2:5, 8:15, 33:22, 36:5, 36:14, 36:20, 36:22, 37:1, 37:13, 38:5, 38:23, 39:17, 39:18, 39:22, 40:11, 41:13, 44:8, 44:21, 45:5, 46:8, 48:1, 48:9, 48:11, 48:14, 48:19, 49:13, 62:17, 63:6, 145:12, 183:17, 183:19, 183:22, 184:2, 184:3 rochester 2:5 rockwood 3:23, 6:18, 6:22, 8:13,	8:16, 8:17, 15:24, 36:5, 36:14, 52:3, 59:11, 59:12, 59:18, 59:19, 59:21, 62:18, 63:6, 74:10, 77:4, 77:7, 84:4, 85:11, 85:17, 85:23, 86:6, 89:16, 90:17, 145:13, 183:18, 184:4, 184:5 role 115:5, 115:8, 115:14 roles 42:1 ron 28:25, 88:13 room 124:13 roughly 123:18 route 63:23 rpr 1:42 rule 189:4 rules 1:45, 99:21 <hr/> s <hr/> s 109:17 said 5:8, 16:7, 26:3, 38:4, 51:10, 55:21, 58:24, 67:13, 67:17, 68:7, 71:9, 77:5, 78:25, 81:10, 91:11, 103:24, 118:11, 152:4, 156:18, 156:22,	159:6, 161:19, 161:21, 171:25, 172:9, 172:12, 175:11, 181:1 sale 109:17, 110:9, 110:14 sales 42:6 same 14:25, 30:15, 30:21, 58:12, 59:18, 63:8, 84:5, 98:25, 99:3, 105:24, 113:1, 123:3, 123:6, 145:17, 145:18, 147:21, 151:1, 151:8, 160:19, 170:22, 171:14, 171:19, 187:2, 189:1 saona 111:17, 111:19, 111:20, 111:25, 112:2 saturday 10:14, 52:6 savings 106:4, 107:4, 107:12, 107:16, 108:2 say 8:5, 16:20, 17:17, 20:21, 25:1, 32:23, 36:25, 37:10, 43:7, 44:17, 51:13, 59:4, 61:1, 61:4, 61:11, 62:20, 65:4, 66:11, 69:18, 73:15, 75:11, 77:10, 77:15, 78:3, 78:24, 80:17, 85:16, 86:20, 87:9, 87:15,
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Transcript of Angela Svonavec
Conducted on November 4, 2024

220

87:23, 91:7, 93:22, 96:16, 96:17, 104:22, 105:8, 113:3, 113:21, 116:21, 125:14, 128:4, 132:14, 132:20, 134:2, 152:3, 159:18, 159:19, 160:3, 166:6, 175:25, 176:5, 180:1, 181:6 saying 17:23, 18:14, 28:15, 33:15, 50:4, 72:9, 78:8, 80:3, 91:16, 97:14, 101:23, 102:12, 110:18, 127:21, 132:12, 133:14, 134:19, 135:22, 136:8, 136:10, 136:24, 137:1, 137:19, 138:14, 138:16, 139:21, 143:13, 154:2, 154:3, 159:7, 159:10, 163:4 says 14:23, 18:9, 18:10, 19:19, 19:20, 20:2, 20:9, 22:23, 24:11, 36:14, 65:13, 65:25, 66:17, 70:20, 77:4, 79:9, 81:17, 82:22, 82:25, 85:15, 86:7, 87:7, 89:9, 89:20, 90:8, 91:1, 91:3, 91:8, 96:5, 96:6, 96:9, 101:21, 102:25, 103:3, 103:20, 107:6,	110:4, 112:21, 117:9, 117:11, 117:16, 117:18, 118:1, 121:3, 128:22, 133:12, 140:12, 140:16, 140:17, 147:11, 147:12, 152:16, 153:14, 154:6, 154:8, 162:15, 164:19, 165:22, 167:13, 170:1, 170:12, 170:15, 177:23, 178:5, 179:8 scale 37:20, 37:21, 37:25 scales 38:2 schedule 10:16 school 6:20, 6:24, 8:3, 51:20, 52:2, 52:22, 53:5, 53:6, 53:13, 55:25, 56:7, 56:18, 59:10, 59:15, 59:16, 59:17, 60:2, 60:4, 60:7, 60:15, 60:18, 60:21, 61:12 schooled 56:5, 56:6, 59:23 schooling 16:6, 60:1, 61:2 schools 52:1, 56:4 schrift 6:4 scott 28:23, 28:25 screen 72:16	scribbler 156:9 scribbles 160:22 searchable 184:24 season 53:10, 53:22 second 18:10, 18:17, 24:11, 64:8, 65:12, 70:19, 110:6, 112:20, 152:15, 158:3 secretary 146:14 section 14:2, 14:14, 15:7, 89:24 secured 74:3 seeing 22:16, 23:6, 34:19, 66:13, 101:15, 102:14 seek 52:16 seem 103:7 seems 75:9, 85:2, 152:5 seen 33:25, 34:20, 60:5, 62:6, 73:20, 77:17, 82:22, 85:7, 128:18, 129:11, 131:16, 131:25, 134:15, 134:20, 134:25, 135:25, 139:19, 150:2, 150:4 segment 182:22 sell 30:7, 42:17, 43:16, 43:18,	43:19, 43:20, 45:16, 46:17, 46:20, 181:21, 182:24, 183:8, 183:11 selling 46:23, 108:21, 182:21 sells 41:3, 180:23, 180:24, 181:24 send 20:18, 63:9, 180:20 sense 42:3, 96:3, 134:5, 134:6, 182:21 sent 44:12, 86:14, 106:20, 126:23, 172:19 sentence 65:13, 66:17, 81:5, 107:9, 107:10, 110:23, 110:25, 112:20 sentencing 78:16, 83:19, 84:12, 85:12, 87:10, 87:17 separate 50:5, 58:13, 117:4 separated 31:13 separately 21:18, 25:7, 95:1, 95:18, 96:23, 97:7, 98:7 september 32:8, 32:10, 53:24, 54:4, 56:14, 57:7, 57:8, 57:9, 140:23, 141:3, 141:5, 143:7,
--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Transcript of Angela Svonavec
Conducted on November 4, 2024

221

143:8, 143:9, 143:25 serve 66:18, 177:24 served 64:1, 64:3 service 106:20, 117:6, 118:7, 118:9, 118:14, 121:22, 180:7, 183:13 services 46:18, 46:21, 117:19, 179:11, 179:13 set 41:17, 89:21, 91:1, 91:11 several 11:18 shall 14:23, 15:7, 178:6, 178:15 shared 9:23, 9:24, 10:2, 10:11, 52:5 shareholder's 101:23, 102:1, 102:11 shares 65:15 shed 137:24 shelter 108:7 shorthand 1:43, 188:36 shots 143:4 should 49:10, 49:12, 65:4, 74:21, 90:8, 96:11, 101:16, 103:24, 109:23, 109:24 show 13:10, 18:1,	32:20, 56:21, 63:14, 70:2, 72:17, 74:23, 78:13, 101:3, 139:15, 139:20, 146:18, 166:2, 170:25 showing 14:11, 14:20, 33:4, 62:2, 72:6, 72:19, 82:15, 85:4, 88:8, 124:11, 128:10, 144:6, 144:7, 147:3, 156:24, 157:2, 159:24, 174:18 shown 13:15, 166:12 shows 136:18, 139:4, 139:8, 175:21 sibling 6:6 siblings 5:25 sic 65:22, 69:18 side 37:7, 50:9, 128:22 sided 101:5 sign 152:19, 152:21, 153:10, 160:23, 161:3, 161:4 signature 3:7, 151:15, 153:3, 153:8, 154:22, 154:23, 155:12, 155:18, 155:21, 155:25, 156:1, 156:4, 156:7, 156:14, 158:4, 158:6, 158:8, 158:10, 158:17, 158:22,	158:24, 159:8, 159:16, 160:15, 160:19, 165:12, 165:13, 165:21, 165:22, 166:7, 173:13, 173:25, 174:6, 177:13, 186:1, 187:2, 189:5, 189:10 signature-mig2k 189:21 signatures 166:5, 173:9 signed 15:8, 92:18, 136:2, 146:6, 151:17, 151:22, 152:8, 152:17, 153:16, 153:23, 154:1, 154:2, 154:8, 154:11, 154:19, 154:25, 155:2, 155:5, 155:6, 159:3, 159:11, 161:8, 161:16, 163:14, 170:13, 170:16, 175:20, 176:13, 176:23, 177:8 signing 98:10, 155:12, 155:14 signs 134:24 similar 65:19, 156:8 simplicity 44:10, 63:9 since 11:24, 16:7, 27:12, 30:25, 31:4, 31:9, 31:12, 55:19, 57:22, 57:25, 60:21, 116:6, 135:4 single 25:6, 94:25,	150:13 sit 123:19, 143:14, 168:13 site 43:4, 43:7, 43:10, 44:12, 44:14, 44:25 six 124:5 sixth 2:13 sleep 26:19 slept 26:20 small 156:9 snacks 174:25 snapped 143:4 snippetted 65:22 snowy 72:18 so-called 121:17 soccer 53:7, 53:8, 53:10, 53:11, 53:13, 54:3, 54:6 social 50:21 sold 30:9, 30:10, 30:11, 30:16, 63:1, 76:13, 181:15 sole 48:5 solid 131:7 some 7:13, 7:17, 8:18, 13:3, 30:16, 38:22,
--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Transcript of Angela Svonavec
Conducted on November 4, 2024

222

39:10, 39:20, 49:7, 49:8, 49:9, 50:6, 53:21, 61:1, 71:5, 113:16, 115:8, 126:19, 137:13, 141:19, 141:21, 142:2, 142:25, 145:22, 163:19, 183:5, 183:12, 184:11 somebody 65:6, 74:19, 79:6, 116:17, 130:21, 131:8, 139:18, 163:13 somehow 66:6, 66:12, 77:9 someone 70:14 somerset 5:24, 5:25, 6:12, 11:2, 11:4, 11:5, 49:17, 58:7, 66:1, 66:23, 67:5, 67:11, 68:5, 68:10, 68:11, 68:19, 70:21, 71:20, 71:22, 71:23, 72:1, 72:18, 75:12, 79:13, 79:18, 79:22, 80:3, 81:15, 83:1, 84:4, 84:7 something 23:4, 37:23, 55:17, 59:25, 65:19, 75:24, 87:16, 90:7, 90:13, 93:13, 114:15, 156:11, 173:2 sometimes 86:4, 134:3, 155:21	somewhere 61:13, 113:20, 130:20, 139:19 soon 124:13, 174:21 sooner 71:9 sorry 11:6, 20:6, 37:6, 37:8, 38:3, 48:18, 48:25, 70:24, 71:14, 96:6, 96:8, 101:5, 104:11, 122:15, 125:2, 128:13, 162:22, 166:4, 172:1, 176:20, 177:19, 178:10 sort 84:3, 137:10 sought 179:4 sounds 7:17, 22:15, 55:23, 96:20 space 26:24, 50:15 speak 65:23, 66:9, 75:25, 76:3, 83:17 speaking 67:18, 69:19, 69:23 specific 81:15, 81:16, 89:5, 123:21, 139:23, 146:12, 150:6, 150:22, 155:9, 155:23 specifically 29:14, 66:16, 76:25, 79:21, 80:3, 86:25, 104:21, 150:8, 150:10, 150:24, 160:9, 175:15,	177:17 speculation 152:6 spencer 10:23, 10:24, 11:1, 11:4, 55:21, 56:9, 56:25, 58:24, 61:6, 61:8 spend 52:17 spent 6:16 spoke 53:1, 66:14, 70:14, 102:7, 102:9, 102:12, 104:7 spring 53:17 stamp 88:17, 155:7, 155:11, 155:14, 155:18, 159:13 stamped 88:24, 89:3 stamps 173:16 standing 162:17, 165:7 start 12:20, 12:22, 39:6, 53:20, 56:12, 103:7, 104:15 started 27:9, 46:6 starts 53:11, 53:14 state 4:16, 5:16, 15:1, 28:2, 31:9, 56:25, 57:10, 60:14, 60:17, 69:1, 73:23, 97:13, 98:5, 98:8, 98:10, 99:5,	99:10, 99:15, 106:4, 107:4, 107:12, 107:15, 108:2, 115:20, 116:1, 116:7, 118:16, 118:23, 118:24, 121:8, 121:12, 121:24, 122:14, 141:23, 144:9, 145:20, 145:24, 145:25, 146:3, 146:14, 158:1, 173:3, 179:23, 180:1, 180:2 stated 1:46 statement 3:19, 14:20, 14:23, 15:1, 15:7, 33:9, 34:23, 72:23, 74:4, 78:8, 78:10, 86:12, 89:23, 106:8 states 1:1, 4:7, 52:22, 63:24, 84:1, 85:2, 101:22, 122:18, 122:24, 179:23, 182:18, 188:1 stating 102:11 status 19:11, 19:21, 21:10, 24:12, 24:16, 24:25, 93:9 statuses 18:20 statute 14:2, 14:9, 14:23, 15:6 statutes 3:12, 14:14 stay 32:15, 54:23,
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Transcript of Angela Svonavec
Conducted on November 4, 2024

223

130:4, 130:19 stayed 8:22 stenograph 188:40 step 136:19 still 29:24, 57:4, 57:15, 58:4, 62:25, 76:8, 84:5, 145:15 stipulate 36:13, 92:10, 96:16 stone 12:2, 12:3, 12:12, 17:10, 17:14, 30:13, 30:20, 30:22, 32:13, 32:14, 41:3, 48:11, 61:6, 61:16, 74:9, 74:17, 89:15, 90:16, 91:5 stop 17:4, 71:3, 100:14, 139:11, 158:14, 158:15, 164:12, 178:7, 178:16 straight 130:23 strain 128:15 studied 7:9, 7:10, 7:11 style 173:21, 174:1, 174:9 subject 15:11, 15:16, 20:15, 68:8, 84:22, 89:23, 184:9 submit 83:11, 83:21	submitted 29:23, 73:25, 84:17 subparagraph 14:19 substance 166:24 substantial 106:3, 107:3, 107:11, 107:14, 108:1 sued 90:13 sufficiency 167:15 sugar 174:25 suggest 71:15 suggested 170:21 suggesting 36:21 suite 1:44, 4:14 summer 53:12, 133:1, 141:15, 141:24, 142:5 sunbiz 98:19 sunday 85:22 sunny 26:6 super 175:1 supplies 182:20, 182:24 supply 90:7 support 3:31, 68:23, 83:22, 85:11, 160:10, 160:12, 162:10 supported 86:14	supporting 80:7 supposedly 161:14 sure 10:1, 12:14, 31:4, 32:22, 36:15, 46:22, 47:6, 48:2, 48:22, 49:12, 49:15, 57:10, 60:6, 62:1, 71:18, 73:16, 76:19, 84:3, 86:22, 95:2, 98:11, 98:20, 124:2, 124:17, 125:16, 125:18, 128:5, 142:3, 143:3, 148:4, 153:7, 156:5, 175:18, 180:14 surprise 110:21 svonavec's 3:40, 143:21, 155:18, 156:3, 156:14, 159:8, 173:13, 184:10 svonavecs 112:24 swearing 90:2 switched 55:6, 55:11, 56:13 swore 15:23 sworn 1:40, 4:24, 5:1, 5:3, 14:20, 14:23, 15:7, 28:10, 67:4, 67:9, 162:15, 164:20, 188:41 sydney 9:10, 9:11, 9:13, 9:19,	10:3, 11:4, 51:11, 51:19, 52:17, 53:6, 54:14, 55:4 symbols 95:17 <hr/> T <hr/> take 10:3, 15:8, 49:4, 51:4, 51:6, 96:12, 124:13, 134:23, 136:19, 174:20, 177:19, 178:22, 184:10 taken 1:40, 35:6, 35:12, 120:1, 188:40, 189:16 takes 129:24 taking 4:13, 72:9, 132:14 talk 40:23, 64:14, 68:8, 113:3, 137:22, 154:1, 170:23 talked 32:12, 48:7, 72:13, 180:23 talking 65:6, 84:2, 92:2, 93:16, 99:1, 117:4, 124:24, 138:23, 164:13, 166:5, 180:22, 183:23 tamiami 1:44, 4:14 tax 3:13, 3:14, 17:23, 18:2, 18:6, 18:14, 18:18, 20:14, 21:1, 21:8,
----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Transcript of Angela Svonavec
Conducted on November 4, 2024

224

22:21, 23:2, 23:7, 23:13, 23:15, 24:5, 24:8, 33:12, 91:24, 92:5, 92:13, 92:20, 92:22, 93:3, 93:18, 93:24, 96:21, 97:3, 97:4, 98:5, 98:8, 98:12, 98:19, 98:23, 98:24, 99:5, 99:8, 99:10, 99:15, 99:16, 99:19, 99:20, 100:2, 100:5, 100:9, 100:12, 100:16, 101:23, 102:4, 102:8, 102:16, 103:25, 104:20, 105:8, 106:2, 106:4, 106:10, 107:4, 107:12, 107:15, 107:21, 107:22, 108:2, 108:7, 113:20, 115:20, 115:21, 116:1, 116:8, 117:16, 118:17, 118:24, 119:4, 119:6, 119:10, 119:12, 119:14, 119:17, 119:19, 121:8, 121:12, 121:15, 121:24, 122:4, 123:6, 128:25, 135:2, 135:4, 135:5, 136:21, 180:2, 180:4, 183:15 taxes 17:25, 23:23, 92:17, 93:11, 98:11, 98:16, 98:17, 99:21, 100:12, 106:11,	116:14, 121:10, 180:2 taxpayer 110:7 taxpayers 107:6 teacher 53:3 teeny 141:1 tell 8:6, 11:16, 66:4, 77:6, 77:15, 101:6, 127:16, 130:18, 133:22, 134:23, 141:19, 188:41 telling 5:14, 65:18, 66:8, 71:25, 72:12, 106:2 ten 29:3, 156:22 tend 63:9 tennessee 142:20 tenth 51:17, 51:18 term 100:7, 100:9, 100:23 terrible 61:23 test 54:24 testified 5:3 testify 84:3 testimony 5:14, 8:6, 26:25, 28:10, 34:18, 35:20, 55:13, 57:11, 59:21, 65:5, 67:4, 67:10, 68:3, 71:8,	77:12, 77:24, 79:16, 80:22, 113:24, 114:11, 131:1, 131:13, 135:17, 137:18, 138:3, 138:6, 142:6, 142:23, 143:21, 144:1, 153:9, 153:12, 154:15, 154:16, 154:22, 155:17, 163:2, 163:23, 164:6 tests 54:24 texas 126:23, 127:3, 189:24 th 62:13, 64:8, 74:25, 88:24, 89:8, 89:9, 89:12, 130:3, 131:6, 134:9, 144:17 thank 4:19, 4:22, 4:25, 11:7, 13:13, 15:20, 38:3, 49:4, 56:23, 61:17, 61:25, 70:4, 88:25, 112:5, 125:14, 146:21, 147:2, 158:25, 166:11, 184:15, 184:18 themselves 4:15 thereafter 189:2 thereby 106:4, 107:5, 107:12, 107:16, 108:2 therefor 189:11 therefore 167:13	thing 15:6, 37:11 things 14:24, 53:22, 61:24, 65:2, 146:6, 149:7 think 10:7, 12:11, 18:21, 20:7, 26:2, 26:6, 29:3, 29:10, 29:20, 33:1, 41:9, 43:3, 46:6, 49:19, 50:6, 52:18, 68:10, 68:18, 69:2, 75:16, 82:13, 86:11, 87:7, 87:12, 87:20, 87:23, 87:25, 88:3, 90:22, 91:24, 94:24, 95:3, 100:16, 102:1, 103:12, 103:16, 103:17, 111:4, 115:3, 119:4, 119:6, 123:18, 133:6, 133:14, 142:14, 149:13, 153:21, 154:13, 154:14, 156:12, 159:7, 161:13, 166:7, 166:9, 177:4, 179:15, 181:1, 181:5 thinking 155:4 third 18:21, 22:20, 77:2 thorough 133:4 thought 75:6, 111:13, 135:5, 148:2, 158:23, 172:10 thousands 135:15, 135:22,
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Transcript of Angela Svonavec
Conducted on November 4, 2024

225

<p>138:21, 182:13 three 56:16, 56:17, 94:21, 94:22, 95:13, 125:3, 161:15, 162:21, 162:23, 163:18, 167:13, 168:24, 173:11 through 7:8, 10:16, 11:15, 32:8, 39:15, 41:18, 45:19, 48:21, 51:20, 52:21, 54:7, 55:24, 56:6, 58:11, 60:2, 92:1, 92:5, 92:6, 92:20, 94:25, 96:13, 98:6, 98:7, 99:1, 99:3, 101:11, 114:3, 114:25, 122:13, 122:23, 129:6, 133:1, 143:14, 160:1, 160:8, 177:13, 183:4 throw 179:2 tie 37:11 till 11:22, 17:9, 130:24, 131:4, 132:20, 133:1, 134:1, 138:11, 181:11 time 4:11, 7:22, 8:11, 9:4, 10:13, 10:17, 11:20, 12:24, 13:1, 13:3, 14:9, 14:25, 15:5, 15:14, 16:2, 16:17,</p>	<p>16:18, 17:19, 29:23, 30:1, 30:3, 30:15, 30:16, 30:21, 31:12, 32:6, 32:17, 50:25, 52:16, 52:17, 58:19, 58:22, 59:5, 59:16, 62:21, 64:1, 64:12, 71:17, 74:13, 74:18, 76:8, 88:19, 93:25, 100:22, 101:15, 105:3, 114:24, 115:15, 124:19, 124:22, 126:11, 126:19, 127:3, 133:1, 141:9, 149:1, 164:14, 170:23, 175:3, 175:6, 177:19, 179:12, 182:8, 184:11, 184:17, 188:39 timeframe 96:12 times 10:2, 10:7, 30:25, 82:6, 127:15, 152:23, 155:11, 156:22 timing 62:25, 76:19 tiny 142:22 title 40:20 titled 48:22, 49:2, 49:11 today 4:12, 4:23, 5:14, 35:20, 73:20, 77:24, 104:14, 104:18, 105:2, 123:19, 137:19, 168:13</p>	<p>today's 4:10 together 24:5, 92:23, 94:14, 146:19, 147:3, 170:23 told 52:4, 53:23, 57:13, 106:6, 134:1, 156:10, 176:11 tomah 142:21, 142:22 took 5:11, 7:12, 54:23, 54:24, 66:11, 72:7, 109:15, 127:12, 130:21, 132:4, 145:8 top 18:9, 38:24, 44:3, 88:17, 107:1 topic 72:15 totally 101:1 toward 95:8, 95:9, 106:14, 109:23 towards 120:8 towns 141:20, 142:22 tr 1:44 track 53:7, 53:9, 53:16, 135:1, 178:18, 178:20, 178:25, 179:2 track's 53:17 tracking 129:4 tractor 81:23, 141:19,</p>	<p>142:11, 142:12, 142:15 tradition 65:16 trail 4:14 trailers 126:24 transaction 145:4 transcript 189:9 transfer 3:22, 82:19, 146:1 transferred 145:22 travel 125:25, 126:5, 127:19, 131:15, 131:16, 131:17, 131:18, 131:23, 131:24, 141:14, 141:20, 142:1, 142:14, 143:1, 143:18 traveled 133:3 travels 32:5 travis 9:2, 9:3, 9:16, 9:24, 16:12, 51:21 treasurer 87:6 trees 90:8 tri 69:1 trib 3:20, 74:25, 75:3 tribune 75:8, 75:16 trick 16:22, 182:4 trip 140:21</p>
----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Transcript of Angela Svonavec
Conducted on November 4, 2024

226

tristate 3:14 trucking 7:13 true 77:11, 89:21, 90:14, 91:1, 91:3, 91:12, 108:12, 112:6, 117:5, 118:16, 161:22, 187:3 truly 156:20 trust 62:19, 116:19 truth 188:41, 189:1 truthful 90:23 try 76:24, 94:6, 111:1, 133:9, 166:10 trying 11:25, 16:22, 62:24, 63:25, 87:12, 137:10, 148:2 turn 14:18, 22:19, 23:12, 65:12, 76:20, 79:7, 94:6, 95:6, 102:18, 106:12, 109:22, 112:13, 117:11, 120:7, 152:12, 153:1, 158:3, 162:9, 175:21, 178:4 turned 171:13 turning 15:21 turns 138:2 twice 28:25, 29:1 two 29:2, 76:1,	76:2, 94:21, 95:6, 95:7, 95:8, 95:10, 111:7, 111:9, 129:7, 130:23, 131:8, 143:15, 146:18, 149:7, 167:12, 173:10, 176:13 type 26:17, 111:24, 128:17 typewriting 189:2 typically 32:7 <hr/> <p style="text-align: center;">U</p> <hr/> uccl 3:19, 72:23, 74:3 uh-huh 7:6, 7:15, 8:20, 9:17, 10:21, 12:6, 15:2, 17:21, 19:15, 21:12, 21:19, 22:22, 31:11, 32:2, 32:11, 32:19, 32:23, 33:10, 34:4, 37:14, 39:1, 39:12, 41:20, 42:24, 43:13, 43:15, 46:12, 49:22, 50:18, 52:7, 52:9, 53:25, 54:16, 55:8, 56:8, 58:11, 60:2, 60:11, 64:5, 69:17, 76:6, 79:7, 79:11, 81:14, 83:5, 84:6, 84:10, 85:21, 94:3, 97:16, 99:13, 105:1,	108:12, 111:21, 112:18, 129:19, 142:8, 145:14, 152:15, 158:7, 172:22, 173:22, 175:10, 175:23 unable 84:11 unbelievable 82:1 under 9:21, 15:8, 15:23, 20:14, 21:9, 24:16, 67:5, 67:10, 68:3, 76:25, 77:3, 77:24, 79:16, 80:22, 81:11, 102:25, 103:3, 103:18, 112:20, 113:24, 114:11, 114:21, 120:13, 153:9, 154:15, 163:23, 164:6, 168:4, 168:15, 169:9, 177:21, 178:5, 178:14, 179:7, 189:2, 189:20 underneath 89:6 understand 5:10, 15:11, 23:1, 23:23, 25:18, 27:20, 33:1, 54:14, 57:4, 64:20, 64:23, 69:7, 69:8, 90:2, 100:11, 107:14, 107:18, 107:19, 107:23, 108:5, 108:6, 119:19, 120:20, 122:9, 122:21, 145:23, 154:17 understanding 12:10, 69:3,	74:16, 93:9, 93:11, 107:25, 109:14, 121:11, 122:12, 122:14, 132:5, 132:11, 147:18, 148:11, 171:23, 172:8, 176:15 understood 15:15, 20:13, 137:17, 137:18, 139:2, 143:22, 147:16 unfortunately 128:14 united 1:1, 4:7, 84:1, 188:1 unless 131:7, 162:18 unlikely 61:5 unredacted 103:2 unsworn 89:24 until 130:24, 131:2, 139:17, 141:13, 176:7, 177:7 unusual 153:21 update 74:21 updated 58:1, 137:7, 175:25 upper 88:25, 128:22 use 38:23, 44:7, 44:25, 63:9, 108:7, 108:10 using 100:9, 106:23, 129:4, 155:14 usually 31:23, 32:9
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Transcript of Angela Svonavec
Conducted on November 4, 2024

227

V			
vaguely	videotaped	129:6, 172:3,	49:21, 49:25,
75:21, 90:9	1:33, 1:38,	184:19	50:2, 50:7, 50:8
valuable	4:5, 184:16	wanted	website
66:19, 167:14,	view	11:19, 75:25,	64:22
167:18	79:4	78:25, 79:4,	websites
value	viewed	96:19, 145:1,	65:20
168:9, 168:14,	170:13	170:2	week
169:6, 169:19	virginia	wants	31:20, 31:22,
vancouver	63:24, 68:14,	181:6	52:6, 127:1,
43:3	68:25, 69:23,	warranty	163:15
varies	80:14	3:16, 62:16,	weekend
45:19	vis-a-vis	63:5	31:20, 31:23,
various	136:23	washing	142:16
133:3, 141:15	vision	45:1	weeks
vendors	65:15	way	161:15, 162:21,
42:19, 42:20	visit	41:17, 51:8,	163:18
venue	31:18	65:23, 68:18,	weighed
3:22, 82:19	vitally	97:23, 115:22,	37:22, 37:23
ver	69:2	118:20, 121:24,	weighing
90:18	vote	125:10, 125:24,	45:1
verification	28:8, 28:21,	126:6, 126:9,	welcome
90:24	29:5, 57:1,	127:20, 166:6,	92:6
verified	57:5, 57:12,	171:23, 172:5,	went
90:15, 91:10	57:15	172:8, 172:13,	53:9, 55:5,
verify	voted	181:5	94:24, 127:2,
89:20, 91:11	28:23, 29:3	ways	127:17, 130:11,
verifying	voter	49:11, 116:15	131:8, 132:22,
90:3, 90:21,	3:15	we'll	132:24, 139:16,
91:17	voting	22:11, 28:18,	140:23, 142:17
versus	28:22	28:19, 29:18,	weren't
12:10	vs	29:19, 35:19,	22:11, 83:6,
vested	1:11, 1:25,	40:23, 50:15,	109:4, 131:13,
63:25	188:11, 188:25	51:9, 92:10,	143:3, 157:16,
vicariously	W	111:1, 128:15,	157:20, 162:17,
72:5	wait	131:22, 132:2,	175:11
vicinity	29:14, 177:18	137:24, 161:2,	west
13:9	want	170:22, 184:13	15:24, 16:3,
video	8:5, 36:15,	we're	17:4, 17:8,
4:11, 4:13	51:4, 51:25,	27:5, 50:13,	17:18, 18:15,
videographer	67:2, 68:17,	86:4, 86:22,	22:24, 30:2,
2:18, 4:4,	71:16, 71:17,	88:18, 98:25,	30:6, 30:17,
4:11, 4:22,	73:21, 88:21,	117:14, 129:22,	63:24, 68:14,
37:6, 58:18,	91:25, 113:3,	146:2, 166:7,	68:25, 69:23,
58:21, 124:18,	114:6, 114:9,	175:2	80:14
124:21, 175:2,	120:17, 124:3,	we've	western
175:5, 184:15	124:15, 124:16,	48:7, 51:3,	1:2, 4:8, 6:11,
	126:2, 128:4,	86:14, 164:16	188:2
		wealth	wet
		49:18, 49:20,	155:20

Transcript of Angela Svonavec
Conducted on November 4, 2024

228

whatever 45:1, 49:3, 59:15, 94:1, 95:17, 95:21, 114:25, 117:15, 132:21, 138:19, 138:25 whatsoever 136:7 whenever 58:3, 72:16, 124:15, 174:22 whereabouts 136:6, 140:8, 140:10 wherever 67:2 whether 61:16, 99:19, 107:25, 133:22, 150:18, 154:15 white 101:16, 102:21 whiteboard 123:14 whoever 130:21 whole 54:11, 66:11, 132:25, 189:1 wife 101:23, 102:1, 102:11 williams 161:22, 161:23, 164:19, 165:1, 165:7 wisconsin 142:21, 142:22 wish 162:22 withdraw 12:21, 152:6 withdrawn 44:6, 73:11, 92:3, 99:2, 122:15 within 82:1, 82:19,	137:18, 189:8 without 34:16, 36:17, 66:8, 121:24, 122:4, 166:24 witness 1:39, 4:24, 5:1, 13:11, 29:11, 29:17, 32:24, 37:7, 37:8, 37:10, 51:8, 68:2, 83:12, 83:16, 83:18, 83:21, 84:17, 103:13, 112:17, 124:13, 124:16, 131:24, 132:17, 137:6, 137:20, 138:21, 139:10, 151:25, 152:2, 152:11, 165:23, 174:20, 174:24, 181:5, 186:2, 188:39 witnesses 83:2, 83:3, 83:6, 83:17, 84:2, 84:9, 84:11, 84:16 women 75:24 word 46:15, 49:3, 96:13 wording 166:8 words 67:22, 87:24, 103:2 work 28:8, 31:25, 32:4, 38:10, 38:12, 38:16, 38:19, 39:9, 39:10, 39:13, 39:14, 39:21, 41:21, 44:19, 44:24, 45:5,	45:7, 64:18, 64:24, 65:16, 66:1, 66:5, 100:19, 100:20, 100:23, 101:21, 101:24, 104:7, 104:19, 105:18, 105:19, 105:25 worked 6:16, 54:13 working 38:12, 44:15, 100:22, 105:7 works 161:25 wouldn't 44:17, 78:3, 121:23, 133:7, 145:25 write 67:8, 67:13, 67:18, 68:7, 77:14, 84:21, 86:24, 139:12, 139:15, 158:22, 165:20, 165:22, 166:7 writing 71:19, 78:6, 78:23, 79:16, 81:5, 81:11, 82:2 written 117:16 wrong 77:13, 78:9, 78:10, 84:3, 114:10, 124:3, 134:18, 172:3 wrote 70:15, 78:14, 78:21, 85:2, 107:2, 108:9, 108:19, 109:15, 158:16, 174:6 <hr/> Y <hr/> y'all 138:23	yacht 26:17, 26:20, 26:24, 27:23, 125:13 yeah 11:15, 13:5, 14:7, 17:1, 17:3, 20:2, 20:10, 25:22, 27:11, 31:23, 32:5, 32:8, 39:19, 47:15, 49:1, 51:22, 52:20, 53:14, 54:2, 55:17, 59:6, 59:9, 59:18, 61:10, 61:18, 68:2, 72:2, 75:13, 76:12, 84:23, 86:24, 89:4, 89:8, 90:9, 92:11, 96:6, 96:15, 96:18, 98:14, 106:24, 112:11, 113:23, 120:22, 126:18, 127:10, 127:15, 130:9, 131:3, 133:13, 139:24, 141:17, 150:21, 151:25, 153:13, 156:2, 159:2, 159:10, 159:22, 172:5, 172:16, 173:18, 173:24, 174:24, 177:12, 184:21 year 8:5, 12:14, 16:4, 18:24, 19:5, 20:3, 24:19, 29:10, 30:12, 32:6, 33:14, 55:19, 77:4, 77:7, 92:7, 112:9, 113:17, 115:18,
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Transcript of Angela Svonavec
Conducted on November 4, 2024

229

119:14, 123:21, 126:3, 126:18, 127:4, 127:16, 130:3, 130:24, 131:3, 148:3, 181:12 year's 119:17 years 11:10, 11:15, 11:19, 16:20, 22:10, 29:2, 29:3, 31:24, 45:11, 45:19, 55:9, 56:16, 56:17, 86:8, 86:13, 86:15, 92:5, 93:4, 93:10, 98:5, 98:25, 99:3, 103:25, 118:13, 122:12, 122:16, 156:6 yep 10:21, 120:11 youngen 5:20 yourself 76:21, 84:18	0 0016 58:5, 58:10 01 124:19, 124:20 01797 94:7 01844 34:5 03 59:4 Okay 67:25	124:19, 124:20, 124:22 124 3:26 13 3:11, 3:23, 85:3, 85:5, 96:5 14 3:12, 3:24, 17:1, 88:9, 88:10, 144:17, 146:14 144 3:27 1448 1:13, 4:9, 188:13 146 3:28, 3:29 15 3:25, 16:19, 51:14, 51:16, 101:2, 101:4 150 143:25 15222 2:14 15237 2:6 155 36:14 1557 15:25 157 3:30 159 3:31 16 3:26, 3:43, 124:10, 124:12, 128:11 1616 102:20, 103:4 1634 103:7 1646 103:9, 103:16, 112:14, 117:12,	117:19 166 3:32 1695 106:18 1696 106:13, 106:17, 106:25, 120:7, 120:11 17 3:27, 103:8, 144:5, 144:7 170 3:33 1703 101:14 174 3:34 1762 109:23, 110:5 1797 94:15, 94:16 18 3:13, 3:28, 10:17, 89:8, 89:9, 89:12, 146:17, 146:19, 147:5, 151:12 184 15:24, 16:3, 17:4, 17:8, 17:18, 18:15, 22:24, 30:1, 30:6, 30:16 186 50:19 19 3:29, 32:15, 146:22, 146:23, 146:24, 147:5, 152:13, 152:14, 156:2, 156:3, 160:17, 160:18, 160:20 192 12:2, 12:12, 30:13, 30:20, 30:22, 32:13,
zoom 65:2, 65:3	1 1 1:42, 175:3, 175:4, 175:6, 184:17, 185:2 1.2 101:22 10 3:20, 58:19, 58:20, 58:22, 64:8, 74:22, 74:24, 84:8, 88:18, 189:25 100 23:22, 31:4, 47:6, 102:8, 124:2, 124:9, 131:18, 138:9, 138:13, 140:8, 140:10, 144:2, 148:9, 152:11 101 3:25 1015 104:15 11 3:21, 55:22, 59:5, 78:12, 78:14 12 3:22, 29:1, 59:18, 59:20, 82:16, 82:17,		
Z			
\$			
\$111,216 121:2, 121:5 \$2,000 112:8, 112:25, 113:10, 113:25, 114:12, 115:17 \$24,000 115:18			
.			
.186 3:7 .188 3:8			

Transcript of Angela Svonavec
Conducted on November 4, 2024

230

32:14, 48:11, 61:6, 74:9, 74:17, 89:15, 90:16, 91:5 1999 51:11 1st 170:1, 171:12, 176:1	30:25, 31:9, 31:12, 51:13, 51:19, 52:21, 55:22, 55:24, 56:6, 57:23, 57:25, 58:24, 59:2, 59:22, 61:11, 92:22, 95:12, 95:25, 96:8, 96:12, 98:7, 99:1, 99:3, 99:19, 122:13, 122:17, 122:23 2015 103:25, 104:3, 108:21, 109:5, 110:6, 110:12, 112:6, 112:10, 113:18, 113:19, 114:7, 114:9, 115:2, 115:6, 115:7, 119:14, 121:1, 121:6 2016 103:25, 104:3, 104:16 2017 55:20 2018 17:14 2019 17:14, 33:8, 33:12, 33:18, 33:19, 34:22, 88:24, 89:9, 89:12 2020 13:5 2021 13:7, 62:13, 64:9, 70:8, 70:24, 71:5, 71:11 2023 92:6, 92:13, 99:1, 99:3, 122:13, 122:17,	122:23, 131:6, 144:17, 145:4, 147:14, 147:17, 151:8, 157:9 2024 1:35, 1:41, 3:12, 4:2, 4:10, 57:8, 73:6, 75:1, 76:14, 78:21, 126:2, 126:17, 126:20, 127:19, 127:24, 128:8, 129:5, 129:16, 129:25, 130:14, 131:2, 131:5, 131:12, 133:18, 134:9, 135:19, 137:6, 139:5, 139:6, 140:13, 140:18, 140:20, 140:24, 141:3, 141:5, 143:7, 143:8, 143:10, 162:13, 162:16, 162:25, 163:6, 165:8, 170:1, 170:3, 170:9, 170:13, 170:17, 171:3, 171:9, 175:13, 175:21, 176:1, 176:7, 176:8, 176:19, 177:2, 177:5, 177:7, 186:3, 188:34, 188:40, 189:20 21 3:31, 62:12, 159:23, 159:24, 159:25, 160:19, 160:23, 161:3, 161:8, 161:16, 165:21 210 2:13 219 63:23 22 1:41, 3:32,	4:3, 4:11, 13:22, 166:1, 166:2, 166:13, 173:5, 173:12, 173:15, 173:16, 174:1, 175:8 222.17 14:2, 14:9, 14:14 23 3:33, 11:9, 99:19, 146:14, 170:24, 171:1 233 1:26, 58:5, 58:10, 188:26 24 1:13, 1:26, 3:34, 4:9, 88:18, 88:24, 132:15, 139:16, 139:17, 156:6, 170:16, 174:17, 174:19, 176:16, 177:17, 188:13, 188:26 25 55:17, 74:25, 130:3, 131:6 26 62:13, 189:25 2:-cv 1:13, 4:9, 188:13 2nd 170:13, 170:16, 175:21, 176:7, 177:5, 177:7
2		3	
20 3:30, 156:25, 157:1, 159:21, 159:22, 173:7, 174:3, 174:6 2000 8:7, 8:8, 8:9, 8:22, 16:7 2002 8:22 2003 10:25, 55:22 2012 11:21, 18:6, 18:13, 18:18, 19:11, 22:4, 24:1, 26:4, 26:5, 92:2, 92:5, 92:13, 92:21, 93:17, 96:5 2013 22:21, 23:2, 23:6, 23:13, 23:18, 24:1, 24:10, 92:21, 93:17, 95:25 2014 11:22, 12:23, 13:20, 13:22, 16:19, 17:1, 25:16, 25:24, 26:2, 26:7, 26:12, 27:1, 27:17, 27:21, 27:25, 28:11, 29:3, 29:5,		3 129:20, 130:10 3- 129:16, 129:25, 130:14, 131:12, 132:15, 133:18, 135:19, 139:5, 139:16	

Transcript of Angela Svonavec
Conducted on November 4, 2024

231

30 134:9, 139:6, 139:17, 140:13, 140:18, 189:5, 189:8 301 1:44, 4:14 3080 1:44, 4:13 31 58:19, 58:20, 124:20, 124:22, 129:16, 129:20, 129:25, 130:10, 130:14, 131:12, 132:15, 133:18, 135:19, 139:5, 139:16, 140:13, 157:9, 189:25 32 175:3, 175:4 33 3:14 338 39:17, 39:18, 39:21, 48:14, 48:19, 183:19, 184:2 34112 1:44, 4:14 355 2:15 360 72:6 369 2:7 39 58:20, 58:22 3:-cv 1:26, 188:26 3a 177:17, 177:23 <hr/> 4 <hr/> 405 101:22 412 2:7, 2:15	45 175:4, 175:6 47 62:3 4904 89:24 4th 4:10, 141:4 <hr/> 5 <hr/> 550 36:4, 36:14, 36:20, 36:21, 37:1, 37:13, 38:4, 38:23, 40:10, 41:12, 44:5, 44:7, 44:21, 45:5, 46:8, 48:1, 48:9, 48:11, 49:13, 62:17, 63:6, 145:12, 183:17, 183:22, 184:3 5557 16:1 56 1:42, 3:15, 184:17, 185:2 5792 12:18, 12:20, 12:24, 13:3, 57:22, 61:20, 62:3, 62:21, 63:5 5th 76:14, 143:7 <hr/> 6 <hr/> 6- 139:6, 139:17, 140:18 61 3:16 63 3:17 6500 2:15	6th 189:20 <hr/> 7 <hr/> 70 3:18 7033 189:24 706 2:5 72 3:19 7209 111:19, 111:20, 111:24, 112:2 74 3:20 78 3:21 796 3:38, 13:1, 26:9, 27:1, 27:9, 28:11, 29:19, 62:22, 63:6 7th 147:13, 147:17, 151:8 <hr/> 8 <hr/> 8- 146:14 814 58:5, 58:7, 58:10 82 3:22 85 3:23 88 3:24 8th 70:8, 70:24, 71:11, 161:11, 162:5, 162:13, 162:16, 162:25, 163:5, 163:8, 163:14, 163:18,	164:17, 164:20, 165:7 <hr/> 9 <hr/> 9 1:41, 4:3, 4:11 9696 2:7 97 16:15 98 8:10, 16:10, 16:13 99 8:10, 9:12
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------